

**PLANNING APPEALS COMMISSION**

**The Planning (Northern Ireland) Order 1991**

**Article 7**

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

**SECTION 5  
MOYLE DISTRICT 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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## **5.1 BALLYCASTLE**

### **HOUSING**

- 5.1.1 Ballycastle is the largest settlement in the Moyle District Council Area. The plan recognises the town as local hub. Designation BE01 proposes the SDL for Ballycastle and is shown on Map 5/01a of the plan.

#### **Plan Provision for Housing**

- 5.1.2 Taking account of the 2008 HGI revision for Moyle District the draft plan makes provision for 928 housing units in Ballycastle. Between January 1999 and August 2010 some 745 housing units were completed. The Housing Update Paper of March 2011 estimated that up to 1452 housing units could be accommodated within the settlement over the plan period with a surplus of some 524 units (56.57%) above the plan allocation. The Department concluded that there is more than sufficient land in Ballycastle to meet the uplifted housing allocation. There is no need to expand the SDL.

#### **Social Housing**

- 5.1.3 The updated (March 2011) Housing Need Assessment figures, indicated a substantial increase in social housing need for Ballycastle, of some 85 units for the next 7 year period (2011- 2018). This marks a significant increase from the stated 40 social housing units in September 2004. Nonetheless at the EIP the NIHE stated that 50% of this housing need could be met through the delivery of Housing Zonings BEH13 and BEH27, and the remainder of the need could be met with the utilisation of existing NIHE land at Ramoan Road and Broombeg. At the EIP the NIHE stated that they were satisfied that they can address the social housing need within the existing land bank in Ballycastle. The Department accepted this evidence and withdrew their suggestion of the inclusion of objection site 408 to meet the social housing need in Ballycastle. We are satisfied that there is no need to include further land within Ballycastle to meet the social housing needs for the town.

#### **Settlement Development Limits (SDL)**

- 5.1.4 We concluded in section one of the report that there is no strategic need to allocate further housing land in Ballycastle. 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 the report, any extension of the SDL will only be considered where there are urban form arguments or 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 Ballycastle.
- 5.1.5 Our assessment of the objections is made on a clockwise basis, commencing with the North East.

### ***Ballycastle North and North East (North of Cushendall Road/North Clare Road)***

- 5.1.6 Objection 4311 to the non inclusion of lands at **Clare Park, Clare Road** within the SDL. Notwithstanding the planning history (E/2008/0371/O) for a conference centre on the site, the objection was not supported with any evidence to substantiate its inclusion within the SDL. Clare Road provides a strong physical boundary to the north part of the settlement, the inclusion of this land would breach that physical edge. The inclusion of this land within the SDL would give rise to urban sprawl leading towards the coastal edge. We support the Department's exclusion of this land from the SDL.
- 5.1.7 Objection 4900 to the partial exclusion of land at **Silvercliffs Holiday Park** from the SDL. The objection site is occupied by a static caravan park. The SDL has been drawn to include the built development relating to the caravan park within the settlement leaving the remaining part of the caravan park outside 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 settlement limits. There are no site specific arguments that would persuade us to resile from that opinion. We support the Department's exclusion of the land from the SDL.

### ***Ballycastle South and South East (South of Cushendall Road/East of Fairhill Street)***

- 5.1.8 Objections 334 and part of site 5141 relate to two separate fields side by side on land **south of Quay Road Recreational Grounds and the Tow River**. The objection sites both straddle the Tow River. With the exception of a small part of the land along the site's north and north west boundaries, most of the land is physically detached from the edge of the settlement and reads beyond the urban context of the settlement. The inclusion of this land would therefore lead to urban sprawl into the countryside and would not give rise to a compact urban form. This land should remain outside the SDL.
- 5.1.9 Objection 334 relates to a large portion of land comprising individual fields on land **south of the Tow River**. The site is physically separated from the proposed SDL and therefore its inclusion within the SDL would not present a logical edge to the settlement. Accordingly this land should remain outside the SDL.
- 5.1.10 Objection 334 is to land north of **Drumavoley Park and west of Housing Zoning BEH13 15 Glenshesk Road**. The objection site is a large area of land. The northern part falls within the flood plain. The remaining part of the site could present a logical infill or rounding off of development at this location within the settlement. No evidence was presented to support the division of the land. The over provision of housing land in Ballycastle overrides the site specific characteristic of this land that falls outside the flood plain. This land should remain outside the SDL.
- 5.1.11 Objection 334 on land **south of Strand Cottages** relates to a large area of land. The northern part of the site falls within the flood plain and a scheduled archeological monument is also located in the centre of the site. Access to

this land is also restricted because of the river. These constraints would limit the development potential of the site making it an unsuitable inclusion within the SDL.

- 5.1.12 Objection 334 on land **north west of Drumavoley Park** is located within the Conservation Area. The eastern portion of the objection site sits within the surrounding urban form. Nonetheless the over provision of housing land outweighs the site specific characteristics of this land. The objection site should not be included in the SDL.
- 5.1.13 Objections 334 relates to four individual sites **south west of Dunamallaght Park and Dunamallaght Crescent**. The northern part of this land falls within the Conservation Area. The land is visually important to the setting of the town. The inclusion of these objection sites, either individually or collectively, would further extend this leg of built development into the open countryside, adding to urban sprawl in this area. Their inclusion collectively or individually would not give rise to a compact urban form. We support the exclusion of this land from within the SDL.
- 5.1.14 Objection 334 relates to a large rectangular portion land that crosses the **Drumavoley Road to the very south of the settlement**. This area of land is elevated to the west side of Drumavoley Road and slopes down to the east side of the road. Any development on this land would be visually prominent when approaching the settlement along Drumavoley Road and Glenshesk Road. Its inclusion would give rise to further linear expansion to the southern edge of the settlement resulting in urban sprawl in this direction. Accordingly we support its exclusion from within the SDL.
- 5.1.15 Objection 334 relates to land that wraps around the rear of the existing housing **to the east side of Drumavoley Road**. Objection 4827 also relates to land in this area to the rear of **16-22 Drumavoley Road**. This area of land slopes steeply downwards to the river valley. The planning history of this land shows that on 1<sup>st</sup> March 2010 the Department granted a Certificate of Lawful Use *“for use of land as a domestic garden related to the enjoyment of the dwelling at 22 Drumavoley Road.”* We also note that the Urban Footprint map defined for Ballycastle, as illustrated in Technical Supplement 1 (map 11), shows Nos 16-22 Drumavoley Road as being within the footprint. While the objection site is not included within what is defined as the urban footprint it is clear that in the RDS 2035 the urban footprint is defined as containing *“..land which has a formal urban use including land on the edge of the settlement where it forms part of the curtilage of a building”*. Given the existence of the LDC it is difficult not to regard the objection site as being part of the urban footprint as so defined in the RDS. We note that the RDS also goes on to state that *“..this does not necessarily imply that gardens are acceptable for housing development.”* While we conclude that the site should be taken within the SDL it would not be appropriate to zone it for housing.
- 5.1.16 Objection 334 relates to land **south of Glenshesk Road and along the south side of the Glenshesk River bank**. Most of the site falls within the flood plain. The land is completely detached from the proposed SDL. Accordingly it would not present a logical inclusion within the SDL.

- 5.1.17 Objection 334 relates to land **north east of Drumavoley Road**. The site is completely detached from the SDL, and its inclusion within it would, therefore, be illogical.
- 5.1.18 Objection 334 seeks the inclusion of a sizeable portion of land extending to the west and rear of **Shesburn Garage**. The inclusion of this land within the SDL does not sit easily with the urban form of the settlement. A significant portion of the land is within the flood plain and a SLNCl is also designated on the site. Given the visual appearance and site constraints we would not support the inclusion of this land within the SDL.
- 5.1.19 Objection 334 relates to **land east of the Glenshesk River and South of Cushendall Road**. The site includes part of the Ballycastle Golf Club, which is operational at present and makes an important visual contribution to the setting of the settlement. The proposed LLPA BEL04 Coast and Links seeks to protect the landscape setting of this area. The inclusion of this land would give rise to urban sprawl east of the Glenshesk Road. We do not support the inclusion of this land within the SDL.
- 5.1.20 Objection 4446 relates to a large area of land comprising 4 large fields to the south side off **Dun-a-mallaght Road**. Objection 5618 also relates to this land and a small area of land on the opposite side of this road. Objection 4446 presents the justification for the inclusion of this land on the basis of the planning permission (E/2002/0032/F) which was granted on part of this site for tourist accommodation. The boundary of the site relating to this planning permission is at the most western part of the objection site and shares no physical attachment with the proposed SDL. Tourism development or tourist related development can be located in the countryside and does not have to be within a settlement. It falls to be considered within the context of regional policy contained in PPS21 and PPS16. We are therefore not persuaded that an approved tourist use on the edge of the settlement would warrant the inclusion of this land within the SDL. Objection 5618 seeks that the land be zoned for housing. The inclusion of either objection site would result in a significant expansion to the settlement at this location and would give rise to unnecessary urban sprawl into the open countryside. We conclude that both sites should be left outside the SDL.
- 5.1.21 Objection 4981 relates to some 0.11 hectares of land along the **north west side of Dun-a-mallaght Road**. The site abuts development to the north east at Dun-a-mallaght Park and benefits from being opposite development to the other side of Dun-a-mallaght Road. Small scale development already occupies the site. Development potential on the site is limited due to its size but its inclusion would give rise to road frontage development creating the appearance of linear development at this location. Notwithstanding the small scale of the site we are satisfied that it should remain outside the SDL.
- 5.1.22 Objections 4983, part of site 5141, part of site 5704, 5186 & 5618 seek the inclusion of a small triangular portion of land at **Station Road** within the SDL. Objection 4983 seeks housing on the site and objection 5758 seeks that the site be identified as a retail opportunity site. The site abuts the SDL and the proposed town centre boundary. At present it is dominated by mature trees and a roadway leading down to into a private path to the Tow River.

Development on the lower southern part of the site would be constrained by the flood plain. The entire site is also within the Ballycastle Conservation Area. Any development on the site would have to respect the character of the Conservation Area. The smaller site as indicated by objection 4983 and part of objection site 5141 would represent a logical rounding off to this part of the settlement. However at present the openness offered by site which is now free from intensive development means that views are facilitated out of the Conservation Area from the town centre to towards Tow Valley. Accordingly we are satisfied that this land should remain outside the SDL.

- 5.1.23 Objections 4983 and 5704 relate to land located directly to the **rear of 29, 29a and 31 Dun-a-mallaght Road and south and south west of Dun-a-mallaght Crescent** and a small site on **the opposite 29 Dun-a-mallaght Road**. A single dwelling is already built on the small area of land opposite 29 Dun-a-mallaght Road and is physically and visually related to the settlement. The inclusion of this portion of land would make a logical inclusion to the SDL along Dun-a-mallaght Road. The land to the rear of 29, 29a and 31 Dun-a-mallaght Road is also developed. It would also make a logical edge and rounding off to the SDL at this location. The Department accepted that the inclusion of objection sites 5704 and 4983 would not present any problem to the overall plan objectives. We accept that this land should all be included within the SDL for Ballycastle.
- 5.1.24 Objection 5082 relates to a large area of land stretching from **Strand Cottages down to land adjacent to 19 Drumavoley Park** within the SDL. The land encompasses the Tow River and flood plain. Whilst the site is bounded by development on three sides, the inclusion of all this land would significantly expand the settlement at this location resulting in unnecessary urban sprawl. Accordingly the objection is not sustained.
- 5.1.25 Objection 5704 seeks the inclusion of part of the **Open Space Zoning BEO01 Quay Road Recreational Grounds** within the SDL. The objection was not substantiated with any persuasive evidence to demonstrate why this land should be included within the SDL for development purposes with the potential loss of valued open space. The objection is not sustained.

***Ballycastle South and South West (South of Novally Road to west of Fairhill Street)***

- 5.1.26 Objection 287 relates to a large area of land **south of Kilns Road**. The site takes in steeply sloping land that falls away from road level. It is also within the proposed LLPA designation BEL06 Tow Valley Upper, which covers a very scenic valley important to the setting of Ballycastle. Given its sensitive site location, combined with its scale and size, development on this land would comprise the landscape setting of Ballycastle. Accordingly we would not support its inclusion within the SDL.
- 5.1.27 Objection 334 relates to land **south, east and north of Housing Zoning BEH32 Hillside Road**. Objection 5717 also relates to this land, specifically the farm group to the east of Hillside Road. Whilst this land was included within the SDL for Ballycastle in the NEAP 2002 and there are farm buildings on the site 5717, we are not persuaded of the merits of including this land within the

SDL of the successor plan. The inclusion of this land would give rise to urban sprawl, failing to result in a compact urban form at this location. Accordingly, the objections are not sustained.

- 5.1.28 Objections 334 and part of objection 4983 relate to land at **Drumawillan House along Whitepark Road**. The site is a large field to the east side of White Park Road, bounded to the north by Straid Road and the south by Moyarget Road. A newly built housing development is located to the eastern boundary of the site at Ramoan Avenue. Despite the remains of Drumawillan House still existing on the site, the appearance of this site is more akin to that of a countryside location. The inclusion of this land would give rise to a significant expansion to the west side of Ballycastle, resulting in failure to create a compact urban form.
- 5.1.29 Objections 334 and 4453 relate to land **south of Drumawillan Park and Hillside Road**. The residential development at Drumawillan Park provides a solid edge to the settlement at this location along Hillside Road. The inclusion of additional land for housing or development purposes at this location would give rise to unnecessary linear development in this area, failing to result in a compact form of development. We support the exclusion of this land from the SDL.
- 5.1.30 Objection 334 relates to land **south west of Mill Street**. Mill Street provides a solid edge to this part of the settlement. There is limited development to the south west side of this street. The land beyond slopes down towards the valley. The south west boundary of the site is defined by the River Tow and a large part of the site is within its flood plain. The inclusion of this land would give rise to an intrusion of development further into the countryside and would fail to maintain a compact form of urban development. Accordingly, we support its exclusion from the SDL.
- 5.1.31 Objection 334 relates to a triangular portion of **land south east of the River Tow and west of Fairhill Street** and large rectangular site **off Fairhill Street**. Individually or collectively the inclusion of these sites would present an illogical edge to the SDL. We are satisfied that this land should remain outside the SDL.
- 5.1.32 Objections 4446, part of objection site 4983 and part of objection site 5704, include land at **Drumawillan to the west side of Whitepark Road**. The site takes in a number of large fields bounded by Whitepark Road to its east boundary and Straid Road to its northern boundary. The rising landform and hedge boundaries provide a rural edge to this part of the settlement offering a backdrop to the town. Planning permission (E/2009/0107/F) has been granted on the site for a hotel, staff accommodation and holiday chalets. The approval of this particular development proposal does not provide justification for the inclusion of this land within the SDL. Given the size and scale of the site it would represent a significant outward intrusion into the countryside, to the west side of Ballycastle, failing to provide a compact settlement form. We are not persuaded that there is justification for this site to be included within the SDL.

- 5.1.33 Objection 4719 and part of objection 5704 (area A) include land south of **Novally Road and west of Whitepark Road**. Whitepark Road provides a strong physical edge to the settlement at this location. The inclusion of this site would breach that physical edge and result in an irregular intrusion to the west side of the settlement at this location. This land should remain outside the SDL.

***Ballycastle North West and West (North of Novally Road to South of Clare Road) (M4)***

- 5.1.34 Objection 334 relates to the de-zoning of land at **Ramoan, Fair Head Caravan Park and Hayes Caravan Park** from within the SDL. Whilst this land was included within the SDL for Ballycastle in the NEAP, the objector provided no persuasive site specific evidence to justify its inclusion within the SDL of this plan. 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 settlement limits. The objection is not sustained.
- 5.1.35 Objection 334 to the exclusion of lands comprising **Leyland Caravan Park, Leyland Road** within the SDL. The objection was not accompanied by a map. The caravan park referred to is known as Fair Head Caravan Park. 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 settlement limits and there are no site specific arguments that would persuade us to take an alternative opinion in respect of this site. The objection is not sustained.
- 5.1.36 Objections 334 and 408 include a small square portion of land to the **east side of Whitepark Road, north of Housing Zoning BEH31**. The adjacent housing zoning takes access from Leyland Road and is partially developed. The inclusion of this small square site would sit within the context of the adjoining housing zoning and the SDL. The Department had identified this site in their written evidence to meet the needs for social housing. However at the EIP the NIHE stated that all of its housing needs could be met within the existing SDL and there was no need to include additional land. Consequently we are satisfied that inclusion of this site within the SDL is not required to meet the social housing need identified for Ballycastle. We support its exclusion from the SDL.
- 5.1.37 Objection 334 includes land **west of Whitepark Road and north of Straid Road**. Whitepark Road provides a clear and distinct physical definition of the SDL at this location. The inclusion of this site would breach that physical boundary resulting in urban sprawl at this location. Accordingly we are satisfied that this land should not be included within the SDL.
- 5.1.38 Objections 334 and 408 relate to land **adjacent to Gortamaddy Drive**. Objection 4983 also relates to this site and the small field to the north of the site. The land in this area is generally flat and lacks enclosure, given its poor boundary definition to the north and west. The site is bounded to the south and east by existing development within the SDL and could therefore present a logical edge to the SDL. However the size and scale of this land would further extend the settlement in a north east direction, giving rise to further

unnecessary urban expansion. Accordingly we support its exclusion from the SDL.

- 5.1.39 Objection 334 relates to the inclusion of two large fields **North West of Gortamaddy Drive**. Of itself access to this land is constrained by neighbouring development. The inclusion of the land would bring this part of the settlement further north west resulting in urban sprawl and should therefore not be included within the SDL.
- 5.1.40 Objection 334 covers a small area of land **opposite 26 White Park Road**. This land has minimal linkage with the proposed SDL and presents an illogical extension at this location. Its inclusion would give rise to urban sprawl. We therefore support its exclusion from the SDL.
- 5.1.41 Objection 334 relates to a small area wrapping around the edge of **Cavan Drive**. Part of the land falls into the proposed LLPA designation BEL 08 Clare Park. There is also a scheduled monument indicated on the site. The inclusion of this land would give rise to further outward intrusion in the countryside at this location, resulting in urban sprawl. Such development would threaten the setting and visual approach to Ballycastle.
- 5.1.42 Objection 334 includes land **west of Cavan Drive which** has no linkage with the proposed SDL. The inclusion of such land would present an illogical extension to the settlement at this location and would fail to provide a compact urban form. We are satisfied that this land should remain outside the SDL.
- 5.1.43 Objection 334 relates to a long linear extension of land **west of Cavan Drive**. The inclusion of this land would give rise to an illogical protrusion at the edge of the SDL. This would fail to provide a compact urban form. We accordingly support its exclusion from the SDL.
- 5.1.44 Objections 334 and 4897 relate to land at **Clare Road**. The land is within the proposed LLPA designation BEL 08 Clare Park. Central to the site is a group of trees known as 'Threepenny Bit Wood'. To the east boundary of the site exists Hayes Caravan Park, which is also excluded from the SDL. Its location at the edge of the settlement provides a soft visual edge to Ballycastle at this location. Development on either objection site at this location would result in a significant expansion to the north west side of the settlement. This would threaten the setting of the settlement as seen when approaching Ballycastle along Clare Road and Whitepark Road. We are not persuaded that there is any overriding reason to include this land within the SDL. Accordingly these objections are not sustained.
- 5.1.45 Objections 334, 5527 & 5618 cover land to the north and south of **Housing Zoning BEH30 10 Whitepark Road**. Objection 5181 relates to land south and west of Housing Zoning BEH 30. The land to the south of the housing zoning follows the steep gradient of Whitepark Road. With exception to limited existing development at Housing Zoning BEH 30, No. 10 Whitepark Road and the Gaelic Pitches, the land to the west side of the road is relatively free from development. Whitepark Road provides a clear physical edge to the settlement at this location. Further development at this location would erode the distinction between the urban form and the surrounding countryside. The

land to the west of Housing Zoning BEH 30 is elevated and any development on this land would be visually prominent in the context of the settlement. The inclusion of any of these sites would fail to provide a compact urban form. We are satisfied that these sites should remain outside the SDL.

- 5.1.46 Objection 4916 relates to land at **Fair Head Caravan Park, Whitepark Road**. The objection site is occupied by a static caravan park. Notwithstanding the presence of built development on adjoining land we support the decision to leave the objection site outside the SDL. We have previously concluded in section 1 of our report, dealing with strategic issues (paragraph 1.3.62), that peripheral caravan parks should be left outside settlement limits. No site specific evidence was provided that would make us resile from that opinion. The objection is not sustained.
- 5.1.47 Objections 4983 and 5181 seek the inclusion of a small site off **Whitepark Road**, immediately north of Housing Zoning BEH 30, within the SDL for housing use. Objection site 5181 is overlapped by objection site 4983. Whilst the Whitepark Road provides a defined edge to the west side of the settlement the Department stated that planning permission (E/2001/0091/F & E/2006/0252/F) has been granted for 5 dwellings on this site. This is now under construction. The Department stated that the site would form a logical inclusion within the SDL. Given that residential development is already under way and is of a modest scale we agree with the Department that the site should be included within the SDL. Given the built commitment on the site there is no need to zone this land for housing.
- 5.1.48 Objections 5181, 5618 relate to land between **Whitepark Road and Ramoan Road**. This land is bounded on three sides by development and fronts the east side of Whitepark Road. Residential development has been approved on the majority of this site over the past 10 years. The most recent planning permission (E/2005/0498/F) on the site for 4 detached dwellings and 8 town houses was granted on 27/02/2008. Given the planning history on the site the Department has recommended that this land is included within the SDL. We consider this to be a logical response and support the inclusion of this land within the SDL. This would not prejudice the overall objectives of the plan.
- 5.1.49 Objection 5291 relates to some 14 fields bounded by **Clare Road and Whitepark Road**. Objection 5527 also seeks up to 50% of this area while objections 4897 and 5618 take in a substantial part of this area. The small square field (field 10) fronting Whitepark Road immediately north of Clare Court is included within both objection sites 5291 and 5527, which has been addressed above. The inclusion of remaining land in all three objection sites because of their size and scale would significantly alter the edge of the SDL, resulting in urban sprawl spreading out into the countryside. We are not persuaded that there is any overriding need to include the full extent of this site within the SDL. Accordingly these objections are not sustained.
- 5.1.50 Objection 5459 seeks that additional land is designated outside the proposed SDL. However the objector failed to identify specific land for inclusion within the SDL and we cannot give this matter any further consideration.

## Recommendations

### 5.1.51 We recommend:

- the inclusion of the garden area associated with objection site 4827 at 22 Drumavolley Road within the SDL for Ballycastle.
- The inclusion of objection site 4983 and 5704 at Dun-a-mallaght Road within the SDL for Ballycastle.
- the inclusion of objection sites 4983 & 5181 off Whitepark Road and immediately north of Housing Zoning BEH 30 within the SDL.
- the inclusion of objection sites 5181 and 5618 relating to land between Whitepark Road and Ramoan Road within the SDL.

## HOUSING ZONINGS

### 5.1.52 The main issues raised include:

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

### **Housing Zonings should be removed from the Plan.**

- 5.1.53 Objection 334 to Housing Zoning **BEH 01 Market Yard** was not substantiated. Objection 5646 seeks that land at Market Yard is zoned for housing. While no map was provided with this objection it appears to us that the land at Market Yard was zoned and is developed. Accordingly both objections are not sustained.
- 5.1.54 Objection 334 to Housing Zonings **BEH 02 Leyland House, BEH 03 Leyland/Ramoan Road, BEH 04 22 Cedar Ridge, BEH 05 Quay Road/Mary Street, BEH 06 Caman Drive Extension, BEH 07 8 Moyle Road, BEH 08 Rockfield, BEH 09 8-10 North Street, BEH 10 Mill Street, BEH 11 Clare Avenue, BEH 12 Rear of 34 Rathlin Road, BEH 13 15 Glenshesk Road, BEH 14 47 Quay Road, BEH 15 39 Mill Street, BEH 16 Rear of Sheskburn House, BEH 17 23 Mill Street, BEH 18 Whiteland East Leyland Heights, BEH 19 Adjoining Ballycastle High School, BEH 20 17 North Street, BEH 21 Adjoining 15-19 Drumavoley Park, BEH 22 Drumamallaght Park, BEH 23 Drumavoley House, BEH 24 Adjoining Lir Court, BEH25 7-9 Quay Road, BEH 26 Fairhill Street, BEH 27 East of Gortamaddy Park, BEH 28 Rear of 63-65 Castle Street, BEH 29 Drumavoley Road, BEH 30 10 Whitepark Road, BEH 31 Whitepark/Leyland Road and BEH 32 Hillside Road** was not substantiated. Some of these zonings have been developed or have the benefit of planning permission. Accordingly the objections are not sustained.
- 5.1.55 Objection 5 to Housing Zoning **BEH 11 Clare Avenue** was made on the basis that this site represents a back garden site and is unnecessary. The site is

now developed with large detached properties. These properties back onto the roadside dwellings at Clare Road and are accessed via Rathlin View. Accordingly the objection is not sustained.

- 5.1.56 Objection 334 to Housing Zoning **BEH 12 Rear of 34 Rathlin Road** was made on the basis that access is restricted to the site. This housing zoning is a small green space central to the rear of the properties along Strandview, Rathlin Road and Alanvale Park. On the ground the land is backland development where access would have to be provided through third party land. We agree that access to this housing zoning may not be possible. Given this uncertainty we recommend the removal of this housing zoning from the plan.
- 5.1.57 Objection 5429 to Housing Zonings **BEH 13 15 Glenshesk Road, BEH 18 Whitehall East Leyland Heights, BEH 26 Fairhill Street** were not explained or substantiated. Accordingly we can't consider this objection any further.
- 5.1.58 Objections 334 to Housing Zonings **BEH 13 15 Glenshesk Road, BEH 10 Mill Street, BEH 19 Adjoining Ballycastle High School, BEH 23 Drumavoley House, BEH 26 Fairhill Street, BEH 32 Hillside Road** on the basis that an LLPA designation overlaps these housing sites and therefore this will restrict the delivery of housing. Some of these sites have been developed or have the benefit of planning permission. The objector failed to provide any persuasive evidence to demonstrate how the LLPA designations restrict the delivery of the housing on each site. Accordingly the objections are not sustained.
- 5.1.59 Objection 334 to Housing Zoning **BEH 19 adjoining Ballycastle High School** on the basis that this is landlocked to the west by existing housing and Anne Street to the south. The objector has speculated that there is a limited chance that the other surrounding land will be released because it is Church ground. Objections 5181 and 5618 also objected to this housing zoning. Objection 5618 stated that part of this site has been committed for the extension to the adjacent graveyard. KSR 4 states that "development of the site will require additional land to provide an access to a public road". This housing zoning is north and west of an existing graveyard, residential development to the south, open space to the east and the High School to the north. Access to this site could be difficult to achieve given the mix of land use and tenure surrounding the school. We agree with the objectors that this leads to the uncertain delivery of this central housing zoning in Ballycastle. We consider the housing zoning should be removed from the plan.
- 5.1.60 Objection 5618 argued that the designation of Housing Zoning **BEH 26 Fairhill Street** was uncertain as industrial development was being considered for the site. This site has, however, partially been developed for housing. We are not persuaded that it should be removed from the plan.
- 5.1.61 Objection 5618 to designation of **Housing Zoning BEH 28 Rear of 63-65 Castle Street** on the basis that there is no available access to this land. The objection was not substantiated with persuasive evidence. A gap in development opens the land on to Mill Street. The objection is not sustained.

## **The KSRs should be amended or deleted**

- 5.1.62 Objection 4406 seeks that Housing Zonings **BEH 03 Leyland Road/Ramoan Road and BEH 18 Whitehall East Leyland Heights** should incorporate some flexibility to permit other uses where there is sufficient housing land and an appropriate alternative comes forward. Objection 5618 made a similar argument in respect of the proposed designation of Housing Zoning **BEH 18 Whitehall East Leyland Heights**, arguing that this land was subject to a proposed retail development for Tesco. In section 1 of our report we considered this argument about flexibility of land zonings in addressing objections to Policy SET 2 of the Plan Strategy and Framework. We concluded that this concern must be set in the context of paragraph 35 of PPS 1 and Article 25(1) of the Planning (NI) Order 1991. Article 25(1) requires the Department to have regard to both the development plan and any other material considerations when considering an application for planning permission. Zoning this land for housing in the plan provides a level of certainty to the public. The Department stated that they expect that part of these housing zonings will meet the needs of social housing in Ballycastle. We do not support these objections.
- 5.1.63 Objection 4987 relates to KSR of proposed Housing Zoning **BEH15 39 Mill Street and BEH23 23 Mill Street**. Planning permission E/2005/0498/F was granted on this site for residential development on 27/02/08. No persuasive evidence was presented to suggest why or how the KSR should be amended. The objection is not sustained.
- 5.1.64 Objection 4667 relates to KSR 4 of Housing Zoning **BEH 25 7-9 Quay Road**, which stipulates that any development proposal shall replicate the architectural style and detail of the original building. Planning permission has been granted for the redevelopment of this site and the site is now redeveloped.

### **Recommendations:**

- 5.1.65 **We recommend:**
- **The removal of Housing Zoning BEH 19 Adjoining Ballycastle High School from the plan.**
  - **The removal of Housing Zoning BEH 12 Rear of 34 Rathlin Road from the plan.**

## **APARTMENT DEVELOPMENT**

- 5.1.66 Objections were received to Designation BEA01 Area of Opportunity for Apartments. This designation has been presented on Map 5/01b Ballycastle 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.
- 5.1.67 Section 1 of our report on the Plan Strategy and Framework recommends deletion of Policy HOU 3. 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**

#### **5.1.68 We recommend:**

- **That Designation BEA 01 Area of Opportunity for Apartment Development is deleted from the plan.**

### **INDUSTRY, BUSINESS AND DISTRIBUTION**

5.1.69 The main issues relates to the zoning of land for Industry, Business and Distribution.

5.1.70 Objection 334, to **Industrial Zonings BEI 01 and BEI 02 Leyland Road**, was made on the basis that these sites do not fully meet the industrial needs of the population for Ballycastle. The objections were not, however, substantiated with any evidence and nor were potential sites for industrial zonings identified. We have already concluded at strategic level that industrial land provision is adequate in Ballycastle. The objection is not sustained.

5.1.71 Objection 5710 to **Industrial Zoning BEI 02** on the basis that 1 hectare of this land will be designated for the Ambulance and Fire Services Use. The objector did not provide any evidence to substantiate their objection. Accordingly this does not warrant any change to this designation for this purpose. The objection is not sustained.

### **TOWN CENTRE**

5.1.72 The plan identified Ballycastle Town Centre on Map 5/01b. The main issues raised relate to:

- (a) The designation of the Town Centre; and
- (b) Land should be designated as a Local Centre.

#### **The Designation of the Town Centre**

5.1.73 Objection 334 to the proposed **Designation BET 01 Ballycastle Town Centre** on the basis that the designation does not accurately reflect the area required to be in the town centre. The objector presented no justification or evidence to explain how the designation should be redefined. Accordingly the objection is not sustained.

5.1.74 Objections 5618 and 5762 relate to the non inclusion of land at **Station Road** within the town centre. Objection 5617 was made on the basis that a planning application has been made for a retail development on this site and that this land would make a logical edge to the town centre. The objector provided no details of this planning history. According to the Department's planning history

map there is a pending application E/2011/0062/F for the redevelopment of this site. Likewise objection 5762 failed to provide any persuasive evidence to demonstrate why this land should be included within the town centre boundary. Accordingly we are not persuaded there is justification to include this site within the town centre boundary.

### **Land should be designated as a Local Centre**

- 5.1.75 Objection 4652 seeks the designation of land at **6-8 Ramoan Road** as a local centre. The site is currently occupied by a Spar food market and is located within a predominantly residential area. Despite the objectors view we consider that this site is close to the town centre where the range of other retail services are already provided in Ballycastle. We are not persuaded that there is a need to designate a local centre on the objection site. Accordingly the objection is not sustained.

### **AREAS OF ARCHAEOLOGICAL POTENTIAL**

- 5.1.76 An area of Archeological Potential has been identified in Ballycastle and is shown on Map 5/01. 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 a position to address any site specific objections made against this particular AAP or its inclusion on the map.

### **TOURISM**

- 5.1.77 The main issues relate to the designation of land for tourism.
- 5.1.78 Objection 4311 seeks the zoning of lands at **Clare Park, Clare Road** for tourism or recreational use. The objection site occupies a large visually important site located between Clare Road and the Coast Line. The objector provided no evidence to support the zoning of the land for tourism. The plan has not zoned any tourism land as proposals for tourism development will be assessed with the context of other Regional Policies. We therefore are not persuaded there is an overriding need to zone this land for tourism.
- 5.1.79 Objection 4900 is to the failure of the plan to zone **Silvercliffs Holiday Park** for tourism with the potential for redevelopment as a brown field site. Tourism use is already established on the site and amendment or variation of the development on the site is a matter for the Development Management function of the Department. We have previously endorsed the exclusion of this site from the SDL. We are therefore not persuaded that this needs a specific zoning for tourism or as a brown field site. Accordingly the objection is not sustained.
- 5.1.80 Objection 4916 seeks the zoning of land at **Fair Head Caravan Park** as a holiday park with potential for future redevelopment as a brown field site.

Tourism use is already established on the site therefore there is no need to zone this site as a holiday park. Accordingly the objection is not sustained.

- 5.1.81 Objection 5618 seeks the designation of land on land opposite **Drumawillan House off Whitepark/Straid Road** for tourism. We acknowledge that planning permission has been granted for a hotel complex at this location. Nonetheless we are not persuaded that this area requires a specific tourism designation. Accordingly the objection is not sustained.
- 5.1.82 Objections 5629 & 5704 seek the zoning of **Sheskburn House** for recreational/leisure use to meet the needs of Ballycastle. The plan has not been zoned land for this use. The objectors failed to provide any persuasive evidence to demonstrate why a special designation should be given to this site.
- 5.1.83 Objection 5704 seeks the designation of land at **Dun-a-mallaght Road** for tourism uses. The objection was not supported with any persuasive evidence.

### **LOCAL LANDSCAPE POLICY AREAS (LLPA)**

- 5.1.84 The plan identified 14 LLPA around Ballycastle. The main issues raised relate to the designation of land as an LLPA
- 5.1.85 Objections 334 to Designations **BEL 01 Tow Valley Lower LLPA, BEL 02 Glenshesk LLPA, BEL 03 Carey River LLPA, BEL 04 Coast and Links LLPA, BEL 05 Drumavoley House LLPA, BEL 06 Tow Valley Upper, BEL 07 Ramoan LLPA, BEL 08 Clare Park LLPA, BEL 09 Marconi Memorial LLPA, BEL 10 Ballycastle Seafront, BEL 11 Fairhead View LLPA, BEL 12 Ballycastle High School and St Patricks and St Brigids Church, BEL 13 Ballycastle Presbyterian Church LLPA & BEL 14 O'Connor Memorial LLPA** on the basis that these designations do not accurately reflect the area to be protected or are not worthy of such protection. The objections were not supported with any persuasive evidence or maps to suggest what areas should, or should not, form part of the LLPA. Accordingly the objections are not sustained.
- 5.1.86 Objection 334 to the overlap of Designation **BEL 01 Tow Valley** on the proposed Housing Zoning BEH 13 15 Glenshesk Road on the basis that this housing zoning overlaps the proposed LLPA Designation BEL 01. The supporting paragraph 13.2, page 293, Volume 2 of the plan, relating to the proposed LLPA designation, does not take account of the land that falls within the SDL or that part of this proposed LLPA that is designated for housing. We recommend that the Department reconciles the supporting text for this LLPA with the relative zonings set out in the plan that fall within the proposed designation.
- 5.1.87 Objections 4983 & 5762 seek the removal of land at **Station Road** from the proposed LLPA Designation **BEL 01 Tow Valley Lower**. The LLPA has been designated to protect the landscape features of Tow Valley at this location. Neither objector provided persuasive evidence to demonstrate why this area of land does not contribute to the features which it seeks to protect. Accordingly

we are satisfied that this land should remain within the proposed LLPA designation.

- 5.1.88 Objection 5082 seeks the removal of land **adjoining 19 Drumavoley Park** and objection 5141 seeks the removal of land at **Quay Road** from the proposed LLPA designation of **BEL 01 Tow Valley**. Both objections relate to an extensive area within the lower Tow Valley. This area contributes to the setting of the settlement. Neither objector provided persuasive evidence to demonstrate how this specific area does not contribute to the setting of Ballycastle or why this area does not merit being included within the proposed designation. We are satisfied that this land should remain within the proposed designation.
- 5.1.89 Objections 4337, 4349, 4698 & 4702 seek the removal of Designation **BEL 02 Glenshesk LLPA** from land at **Drumavoley Road** in respect of planning application E/2004/0064/O. Outline planning permission was granted on 18/12/2008 for 5 dwellings on this site. The designation has been drawn to protect the setting of the sloping banks of the Glenshesk River. The objector presented no persuasive evidence to demonstrate why this site should not be included within the designation or how it does not contribute to the landscape setting of the Glenshesk River. The grant of planning permission on the land demonstrates that it can be satisfactorily developed without threatening the landscape character of this area. We therefore support the inclusion of this land within the proposed LLPA designation. Objection 4872 seeks the removal of land to the **rear of 16-22 Drumavoley Road** from this LLPA Designation. The area indicated by the objection site is part of the character of this area. The objector did not provide any persuasive evidence to demonstrate that the quality of this landscape was not worthy for inclusion within the proposed designation. The Department in recognition of the existing development in this LLPA suggested the following amendment to the supporting text to BEL 02 in paragraph 13.3, page 294, Vol 2. The amendment reads as “*This area is within the Antrim Coast and Glens AONB where no further **new** development is appropriate other than that demonstrated to be essential for agricultural purposes. **Exception also allowed for sensitively positioned outbuildings and extension of outbuildings**”.* We support this amendment to facilitate some flexibility in this LLPA.
- 5.1.90 Objection 334 to Housing Zoning BEH 23 Drumavoley House in conjunction with the LLPA **Designation BEL 05 Drumavoley House** on the basis that it is unacceptable to have an LLPA designation on a residential development. The LLPA Designation acknowledges that this land relates to an urban capacity site for Ballycastle but seeks to protect the existing woodland within it. The objector provided no persuasive evidence to demonstrate why this designation should be removed from the housing zoning. Accordingly the objection is not sustained.
- 5.1.91 Objection 5644 considers that Designation **BEL 06 Tow Valley Upper LLPA** should be extended to include the upper slopes of Tow Valley including the spur of land containing Dunamallaght Road. The objector provided no evidence to demonstrate the key features of this area that would justify an LLPA designation at this location.

- 5.1.92 Objection 4365 to the proposed LLPA Designation **BEL 07 Ramoan** on the basis that this land is a natural rounding off to the edge of the settlement. No map was provided to indicate the exact location of the objection site. Furthermore no persuasive evidence was put forward to demonstrate why this land should not merit the proposed LLPA designation. Objection 5181 seeks the removal of land between **Whitepark Road and Ramoan Road** from the proposed LLPA designation BEL 07 Ramoan. The designation seeks to protect the mature deciduous tree groups and belts in this area. The grant of planning permission on the land demonstrates that the site can be development without harm to these trees. As noted above this land is now recommended to be included within the proposed SDL for Ballycastle. At the EiP the Department accepted the objection site, in relation to the recent planning approval (E/2005/0498/F) on the site, could be removed from the proposed LLPA. This would not harm the key landscape features which this designation seeks to protect. We support the Department's recommendation for the removal of objection site 5181, in respect of the planning permission (E/2005/0498/F) from the proposed LLPA.
- 5.1.93 Objections 4311, 4897 & 4986 to the designation of land at **Clare Park & Clare Road** within the LLPA **Designation BEL08 Clare Park**. Objection 4311 relates to a large site between Clare Road and the coast line and objection 4897 relates to the area to the south side of Clare Road. The land in this area is relatively flat and is dominated by mature trees which at one time would have contributed to the former large residence at Clare Park. This area provides an important landscape setting to Ballycastle. The objectors provided no persuasive evidence to demonstrate or justify why this land should be removed from the proposed LLPA designation. Accordingly the objection is not sustained.

### **Recommendations**

5.1.94 **We recommend:**

- **that the supporting text relating to BEL 01 Tow Valley Lower is amended to reconcile the proposed designations in the plan within the SDL.**
- **the wording of paragraph 13.3, page 294, Vol 2 should be amended to to read as follows:**

*“This area is within the Antrim Coast and Glens AONB where no further new development is appropriate other than that demonstrated to be essential for agricultural purposes. Exception also allowed for sensitively positioned outbuildings and extension of outbuildings”*
- **the removal of Objection Site 5181, in respect of the planning permission (E/2005/0498/F), from the proposed LLPA Designation BEL 07 Ramoan**

## 5.2 BUSHMILLS

- 5.2.1 The plan designates Bushmills as a town. The SDL for Bushmills is identified on Map 5/02 of the plan.

### Plan Provision for Housing

- 5.2.2 Taking account of the 2008 HGI revision for Moyle District the draft plan made provision for 225 residential units in Bushmills. Between January 1999 and August 2010 some 225 housing units were completed. The housing Up-date Figure Paper March 2011 taking account of the remaining housing capacity in the settlement estimated there is a surplus of 191 residential units (85%) remaining in Bushmills 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 10 year housing supply from 2011.

### Social Housing

- 5.2.3 The updated (March 2011) Housing Need Assessment figures indicated that there is no social housing need for Bushmills.

### Settlement Development Limits

- 5.2.4 We concluded in section one of the report that there is no strategic need to allocate further housing land in Bushmills. 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, zoning of further 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 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 or zoning of additional housing land for Bushmills. Our assessment of the objections in Bushmills is as follows.
- 5.2.5 Objections 334 and 5186 on land **west of Priestland Road and north of Craigaboney Road** relate to an extensive area of land overlapping Dunluce Rectory. The Department stated that the housing development allowed on appeal (2004/A378) on land at Priestland Road and Craigaboney Road should be included within the SDL. Housing on this site is partially developed. The Department also stated that land to the north east comprising Dunluce Rectory and 15 Priestland Road should also be included within the SDL providing a logical edge to the settlement at this location. We support the inclusion of all of this land within the SDL
- 5.2.6 Objection 334 on land **south of Craigaboney Road** is physically separated from the SDL by other land along the Criagaboney Road. Its inclusion would not give rise to a compact urban form or a logical inclusion within the SDL

- 5.2.7 Objection 334 on land at **3 Craigaboney Road** is occupied by a dwelling and the footings of another dwelling located side by side. Both dwellings are on large plots akin to that found in the countryside. The east boundary of the site provides a strong physical edge to the settlement. The inclusion of the site within the SDL would give rise to the appearance of urban sprawl at this location and would be a signal for more intensive development on this land. Accordingly, even though there is built development on this land, we are satisfied that it should remain outside the proposed SDL.
- 5.2.8 Objection 334 relates to land around **Dunluce Manse and South of Craigaboney Road**. Objection 5186 also relates to the area of land to the north and south of Craigaboney Road. Objections 4499 & 5618 also seek the extension of the SDL to include land at **Dunluce Presbyterian Church Hall and Manse**. The element of the objection to the north has been addressed above in paragraph 5.2.5. The land to the south of Craigaboney Road contains a disused Church Hall with planning approval for its conversion to 8 apartments (E/2007/0013/F) and Dunluce Manse, which is set within a mature vegetated plot north of the church hall. It was explained that development of this land would help finance the building a new church hall. These buildings, whilst situated within the SDL for Bushmills in NEAP 2002, are not characteristically urban. The junction of Priestland Road with Craigaboney Road provides a solid physical and logical stopping point for development at this location. Further development to the west side of Priestland Road would give rise to further urban sprawl. Notwithstanding the various arguemnts presented weare satisfied that this land should be left outside the SDL
- 5.2.9 Objection 334 on land along the **east bank of the River Bush at the Salmon Leap** relates to a small area of land that follows the line of the Bush River to the southern part of the settlement. The site is dominated by trees and vegetation that line the edge of the river. Some of the land also falls within the flood plain. Given the environmental considerations relating to the loss of vegetation and the flood plain this land would be best left outside the SDL.
- 5.2.10 Objection 334 on land to **south and south west of Bush Gardens and east of the River Bush** is at the very south of the settlement. The land is relatively flat at this location and lacks physical definition. If this land were included within the SDL it would give rise to a significant expansion of the settlement to the south resulting in urban sprawl at this location. There is no justification for the expansion of the settlement at this location.
- 5.2.11 Objections 334, 5183, 5186 (part of) and 5704 relate to land **west of Castlecatt Road and east of the River Bush**. Objections 334 & 5183 cover the road side field. Objection 5186 and 5704 (as amended at the EIP) relates to some 1.55 hectares of land along the road side land and the land running to the south of Bush Gardens. With exception to objection 5186 the other objectors were seeking that the land should be designated for housing. The objection site relates to generally flat road side land. The northern part of the road side site is covered in mature vegetation which provides an important transition from the countryside into the town from the southern approach. Development on this land would result in the loss of this vegetation buffer at the edge of the settlement. The inclusion of any of these objection sites within the SDL would extend the settlement significantly to the south in a linear form

along the Castlecatt Road, resulting in urban sprawl. We are satisfied that this land should remain outside the SDL.

- 5.2.12 Objections 334, 5186 (part) and 5704 relate to land to **east of Castlecatt Road and north of Ballyness Holiday Park**. The site includes Ballyness Holiday Cottages and the adjacent land which is partly constrained by ponds and woodlands. This land is prominent along Castlecatt Road due to its elevation and lack of vegetation enclosure along the road side. Development on this site would merge the group of development at 36 and 38 Castlecatt Road with the settlement. This would give rise to the appearance of linear urban sprawl along this road. We support the exclusion of this land from the SDL.
- 5.2.13 Objections 334, 4954 relates to a large area of land along the road side and **opposite Dunluce Secondary School, Dunluce Road**. At the EIP objection site 5186 was reduced to the same field as objection 334 plus adjoining field to the northwest. All of the objections relate to an area of flat road side land on approach into Bushmills. The inclusion of this land would continue development along the north side of Dunluce Road out into the countryside, leading to urban sprawl at this location.
- 5.2.14 Objections 334 on land **west of Tramway Drive and north west of Tramway Drive** relates to two large flat fields set back from Dunluce Road and Ballaghmore Road. The inclusion of either field would give rise to a large protrusion into the countryside and narrow the important visual gap between Bushmills and the nearby settlement of Portballintrae. Development of this land would fail to meet the plans objective of a compact urban form at this location.
- 5.2.15 Objection 334 on land at the junction of **Dunluce Road with Ballaghmore Road** overlaps the junction of the Dunluce Road with Ballaghmore Road. It would be impossible to develop this part of the site for housing. The remaining part of the site relates to a narrow strip of land that facilitates pedestrian access to the settlement from the Bushmills Tram Stop and a small grassed area at the road junction. Accordingly there is no logic or justification for the inclusion of this land.
- 5.2.16 Objections 334 and 5186 on land between **Straid Road, Distillery Road and Bushmills Manse** relates to gently rising land to the east and south of Bushmills Distillery. This area of land is dominated by the Old Bushmills Distillery, which has major employment and tourism significance for the settlement. The site allows important views of the distillery buildings on the approach along Straid Road and its inclusion would diminishes these views and result in urban sprawl along this road. Housing development on the objection site would present potential land use conflicts with the industrial use of land at this location in the settlement. The land is also environmental sensitive given its inclusion with the AONB, the presence of St Columb's Rill and associated race and Bushmills Manse are also on the site. These constraints support the exclusion of this land from the SDL.
- 5.2.17 Objection 334 relates to land east of **Housing Zoning BSH10 land adjacent to Eagry Park**. Housing Zoning BSH10 is partially built. The objection site is

an area of low-lying land running south from Straid Road towards Ballyness Caravan Park. The boundary of Eagry Gardens runs up to a steep drop in the topography and provides a solid defined edge the settlement at this location. A car sales garage and dwelling are located to the eastern boundary of the site along Straid Road. The inclusion of development on this land would breach the existing defined edge to settlement and result in a linear expansion of development along Straid Road linking the settlement to the car sales garage. This would be a significant expansion to east side of Bushmills failing to create a compact settlement form. Accordingly the objection is not sustained.

- 5.2.18 Objection 334 relates to land west of **Dunluce Secondary School along Dunluce Road**. The inclusion of this flat area of land would result in the continuation of linear road side development westwards out of Bushmills. Its inclusion would therefore fail to provide a compact urban form at this location.
- 5.2.19 Objection 4986 relates to some 4.2 hectares of **land north of BSI 01 Old Bushmills Distillery**. The objection site is located on elevated land which provides a backdrop to the settlement when viewed from Dunluce and Ballyclogh Roads. This land is also constrained by its inclusion within the setting of the WHS, the Causeway Coast AONB and the proposed LLPA BSL04 Dunadrave LLPA. Development of housing immediately adjacent to the Bushmills Distillery would conflict and restrict the further development of this important industrial site. The objector provided no evidence to support any other development need on this land. The constraints relating to the site means that we support the exclusion of this land from the SDL.
- 5.2.20 Objection 5186 relates to lands **at Stranalane**. At the EIP the objection site was amended to exclude the scarp slope along the site's southern boundary, in order to keep it free from development. This slope therefore provides a backdrop to the site and the flat land comprising the all weather pitches along Dunluce Road. The site wraps around to the west and south of Dunluce Secondary School and links in with the existing and approved development along Craigaboney Road. The school playing fields provide a soft edge to the settlement at this location assimilating the urban form into the countryside. Development on this land would further expand the settlement to the west giving rise to unnecessary urban sprawl at this location.
- 5.2.21 Objection 5618 seeks the inclusion of **lands south of Dunluce Presbyterian Church, Priestland Road**. This is a roadside portion of land on approach from the south into the settlement. The east part of the site overlaps the River Bush. This part of the site is therefore constrained from development. Development on this land would expand the settlement further south along Priestland Road and would impact on views of the listed Dunluce Presbyterian Church. Development of this land would not achieve a compact urban form. The land should not be included within the SDL.
- 5.2.22 Objection 5646 states that the new Causeway Coast sub-regional tourist centre could be located as an infill extension to Bushmills. The objector suggested locating it between **Riverdale Lodge and Tramway Drive**. The tourist centre is now built and located on the National Trust property at the Giant's Causeway. Accordingly this objection is not sustained.

- 5.2.23 Objection 5704 relates to the **rear of 1-23 Main Street**. The Department advised that planning permission (E/2005/0531/F) has been granted for the extension of the existing hotel to provide additional bed rooms, staff accommodation, conference facilities, a spa and parking. We support the Departments recommendation that it would be logical to include the part of the site to which this approval relates. We also accept there is no need to include the remaining 0.2 hectare of the site which relates to an area of dense mature trees and scrub vegetation along the River Bush corridor within the SDL. We therefore do not support the inclusion of this land for housing especially as it is located within the River Bush flood plain.
- 5.2.24 Objection 5271 relates to land adjacent to **1 Main Street**. The SDL as proposed results in the severance of a domestic garden belonging to Woodville House, 1 Main Street from its associated dwelling house. This property is a Listed Building, its garden and settings are therefore afforded legislative and policy protection as indicated by Policy BH 11 of PPS 6. While the objection site is not included within what is defined as the urban footprint for Bushmills in Map 12 of Technical Supplement 1 it is clear that in the RDS 2035 the urban footprint is defined as containing “*..land which has a formal urban use including land on the edge of the settlement where it forms part of the curtilage of a building*”. The objection site is in our view part of the curtilage of Woodville House. We note that the RDS also goes on to state that “*..this does not necessarily imply that gardens are acceptable for housing development.*” We conclude that the objection site should be taken within the SDL.
- 5.2.25 Objection 5750 to the settlement limited of Bushmills was supported with information relating to Cushendall. The objection is accordingly not sustained.

#### **Land should be Zoned within the SDL for Housing**

- 5.2.26 Objection 5098 seeks that land immediately north of **Housing Zoning BSH 03 156-158 Main Street at 140-142 Main Street** is zoned for housing. This site falls with the proposed town centre for Bushmills and is occupied by a row of mixed buildings including the Distillers Arms Restaurant, a furniture store, a restaurant and some vacant properties. There is no overriding need to zone this land for housing. Accordingly we are satisfied that this land should remain as white land in the plan.
- 5.2.27 Objection 5704 seeks that land north of **Bushmills Presbyterian Church** is designated for housing. This site is part of the Church grounds and fronts onto Priestland Road. The site falls within the SDL for Bushmills. The objector did not dispute the Departments housing figures and provided no persuasive evidence to justify designating this land for housing. Accordingly the objection is not sustained.

#### **Recommendations**

- 5.2.28 **We recommend:**
- **The inclusion of land within the SDL as indicated by objection site 334 and 5186 relating to the approved site for housing (2004/A378) at**

**Priestland Road and Craigaboney Road and land at Dunluce Rectory and 15 Priestland Road.**

- **The inclusion of land relating to planning permission E/2005/0531/F within the SDL.**
- **The inclusion of land land adjacent to 1 Main Street, as indicated in Objection 5271, is brought within the SDL**

## **HOUSING ZONINGS**

- 5.2.29 The main issues raised relate to the removal of housing zonings from the plan.
- 5.2.30 Objections 334 to **Housing Zonings BHS01 31-33 Main Street, BSH02 121-123 Main Street, BSH03 156-158 Main Street, BSH04 75 Main Street, BSH05 46 Main Street, BSH06 land to the south of Castlecat Road, BSH07 2 Priestland Road, BSH08 Adjacent to 17 Castlecat Road, BSH09 land adjacent to 9 Ballyness Park and BSH10 land adjacent to Eagry Park** on the basis these sites individually along with the other proposed housing zonings are inadequate to meet the overall provision for housing for Bushmills. No persuasive information was provided to support these objections. Objection 5186 to these housings zoning was not explained or supported with any justification. Accordingly the objections are not sustained.
- 5.2.31 Objection 334 to **Housing Zonings BSH02 121–123 Main Street** on the basis that this housing zoning is overlapped by the proposed LLPA designation BSL02 River Bush. The housing zoning relates to 0.17 hectare of this LLPA designation. Planning permission has been granted (E/2010/0150/F) on this site on 2/12/2010 for 19 apartments and 1 retail unit. The designation has not restricted the delivery of housing on this site. This objection is unfounded.
- 5.2.32 Objections 334 to Housing Zoning **BSH04 75 Main Street & BSH05 46 Main Street** on suitability of these sites for housing development. The objector states that these sites would have been better identified as a Target Site. The housing zonings recognise the importance of the Listed Buildings on both sites. We are not persuaded by either objection that the identification of these sites would be better served as a Target Site. We are satisfied that both zonings are not misleading and that they should remain in the plan.
- 5.2.33 Objection 334 to **Housing Zonings BSH08 adjacent to 17 Castlecat Road** on the basis that this housing zoning is overlapped by the proposed LLPA designation BSL02 River Bush. The housing zoning relates to 0.12 hectares of this LLPA designation. The objector provided no evidence to demonstrate how this designation would restrict the development of this housing zoning. Accordingly the objection is not sustained.
- 5.2.34 Objection 5618 to the designation of Housing Zoning **BSH09 land adjacent to 9 Ballyness Park** for housing. The objector advised that NIHE have secured funding to develop a nursery on the site, therefore this site is not available for housing development. The Department has advised that this land should revert to un-zoned land within the SDL. Given the scale of the site

(0.07hectares) its loss to the housing provision for the settlement would be negligible. We support this amendment to the plan.

### **Recommendations**

#### **5.2.35 We recommend:**

- **The removal of Housing Zoning BSH 09, land adjacent to 9 Ballyness Park, from the plan. This land should remain as white land in the plan.**

### **INDUSTRY, BUSINESS AND DISTRIBUTION**

5.2.36 The main issues relates to the zoning of industrial land.

5.2.37 Objections 334 to **Industrial Zonings BSI01 Old Bushmills Distillery, BSI02 Old Bushmills Distillery Northern Extension and BSI03 Old Bushmills Distillery Southern Extension** on the basis this site does not fully meet the industrial needs of the population for Bushmills, were not substantiated with any evidence or supported with other potential sites for industrial zonings in the plan. The objections relating to the overlapping of the industrial zonings with the AONB and Area of Mineral Constraint were also unsubstantiated. Accordingly none of these objections are sustained.

5.2.38 Objection 4986 seeks the inclusion of some 4.2 hectares of land north of **BSI 01 Old Bushmills Distillery** within the SDL for industry. The objection site is immediately adjacent to the existing industrial site in Bushmills and the plan has made provision for the future expansion of this site. However the objection site is visually prominent viewed from Dunluce and Ballyclogh Roads. This area is constrained by its inclusion within the setting of the WHS, the Causeway Coast AONB and the proposed LLPA BSL04 Dunadrave LLPA. The objector provided no supporting evidence to suggest a need for more industrial land in Bushmills. We support the Department view that there is no additional need for more industrial land within Bushmills.

5.2.39 Objection 5618 seeks that more industrial land is zoned within the settlement. However the objection was not substantiated with evidence to support the designation of more industrial land or where this should be located in the settlement. Accordingly the objection is not sustained.

### **TOWN CENTRE**

5.2.40 The main issue relates to the designation of the town centre.

5.2.41 Objection 334 to the proposed **Designation BSDC Bushmills District Centre** was on the basis that the designation did not accurately reflect the area required to be in the town centre. The Department stated that the proposed District Centre took in part of the Conservation Area and a number of listed buildings. The objector presented no justification or evidence to what extent the Department should relook at this designation. Accordingly the objection is

not sustained. The Department did, however, request that the title of this designation be amended to refer to the 'town centre'. We accept this is a logical amendment to the plan and is consistent with the requirement set out in PPS5 for the designation of town centres in development plans.

### **Recommendations**

#### 5.2.42 **We recommend:**

- **That Designation BSDC 01 Bushmills District Centre should be amended to Bushmills Town Centre.**

### **BUSHMILLS AREA OF ARCHAEOLOGICAL POTENTIAL**

5.2.43 An area of Archeological Potential has been identified in Bushmills and is shown on Map 5/02. 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.

### **TOURISM**

5.2.44 The main issue raised relates to the designation of land for tourism.

5.2.45 Objection 4832 seeks the designation of land at **Straid Road** as a key target site that would enhance the setting of the WHS and gateway to Bushmills. The site is occupied by a car sales garage. The objector failed to demonstrate how this site would contribute to the setting of the WHS or Bushmills as a target gateway site. Accordingly, the objection is not sustained.

5.2.46 Objection 4931 relates to **Ballyness Caravan Park** and seeks that site should be designated as a resort destination for tourism. The Caravan Park has been in situ since 1999. The objector stated that the Caravan Park can now accommodate up to 35 static, 25 touring caravans and space for camping. Buildings on the site also relate to an office/reception and amenity block. The Caravan Park is well laid out and is naturally screened from public view when approaching the settlement by the natural topography along Castlecat Road. We acknowledge that the Caravan Park provides a valuable resource for the tourism market in this area and has benefited from numerous tourism awards. Nonetheless the plan has not identified any sites within the plan area as a tourist resort destination. We don't consider that this site merits a special designation in the plan and therefore this objection is not sustained.

5.2.47 Objection 5186 seeks the inclusion of land north of **Dunluce Road** within the SDL for tourism development. The objection site was reduced to the two fields adjacent to the Dunluce Road comprising some 2.7 hectares. The land in this area is relatively flat and visible from Dunluce Road when approaching the settlement. The objector stated that it is envisaged that the site could be developed to accommodate numerous types of tourist facilities. We

acknowledge that the site is within close proximity to the tram stop for Bushmills. However the objector did not provide evidence for any specific tourist scheme or demonstrate a specific tourism need for the settlement. The plan has not zoned any land for tourism purposes. Regional Policy sets out a framework for assessing proposals for tourism development. We are not persuaded that this site should be included within the settlement for tourism purposes. Furthermore development at this location would give rise to further linear development that would be visually prominent along Dunluce Road. We support the exclusion of this land from within the SDL and we do not consider it should be designated for tourism purposes.

- 5.2.48 Objection 5618 seeks the inclusion of some 5.6 hectares of land between **Ballaghmore Road, Dunluce Road and River Bush** within the SDL for tourism. The objection site relates to an area of flat open land that permits views from Dunluce Road towards the Dundarave Demesne. Development on this land would detract and restrict these open views and give rise to urban sprawl in a northerly direction towards Portballintrae. The site is also heavily constrained by the flood plain of the River Bush. No land has been zoned for tourism in the plan. The identification of a tourism site is a matter to be assessed within the context of regional policy. We therefore support the exclusion of this land from the SDL.

#### **LOCAL LANDSCAPE POLICY AREAS (LLPA)**

- 5.2.49 The main issues raised relate to the designation of LLPA in Bushmills.
- 5.2.50 Objections 334 to the proposed LLPA Designations **BSL 01 Montalto, BSL 02 River Bush, BSL 03 Distillery, BSL 04 Dundarave and BSL05 Bushfoot** on the basis that these designations do not accurately reflect the area to be protected. The objections were not supported with any persuasive evidence or maps to suggest what such areas should or should not form part of the LLPA. The Industrial landscape relating to the Bushmills Distillery is an important element in the landscape setting of the settlement. Accordingly the objections are not sustained.
- 5.2.51 Objection 5186 seeks the removal of land approved for housing development at **Priestland Road/Craigaboney Road** to be removed from the proposed LLPA designation **BSL 01 Montalto**. The Department accepted that it would be logical to remove the area of land that is now partially developed under planning permissions E/2008/0094/RM and E/2005/0364/RM from the LLPA. We consider that this is a logical approach to this designation and support the removal of this land from the LLPA.
- 5.2.52 Objection 4486 is to the proposed LLPA designation **BSL 02 River Bush** on the basis that the designation will be detrimental to plans for sustainable development that the objector may wish to be put forward. The objection was not supported by evidence stating how the designation would be detrimental or what the future plans for the area involved. Accordingly this objection is not sustained.

5.2.53 Objection 5704 to the proposed LLPA designation **BSL 03 Distillery** was unsubstantiated. Objection 4931 seeks the removal of **Ballyness Caravan Park** from the proposed LLPA designation BSL03 Distillery. The amplification for the objection relates to further control being imposed on the future potential of the Caravan Park. At the EIP the Department acknowledged that paragraph 9.4 in support of the proposed designation was overly restrictive and could limit the development on the Caravan Park. The Department suggested the removal of the first part of the sentence set out in paragraph 9.4. The objector was content with this amendment as it would not overly restrict the operation and development of the Caravan Park. We support the following amendment to paragraph 94, page 308, Vol 2 which should read as follows:

*“Within the development limit well designed buildings complementing the traditional built character of the Distillery may be acceptable.”*

5.2.54 Objection 4986 to the proposed LLPA designation **BSL 04 Dunadrave** was unsubstantiated. Objections 4366 seek the removal of land at **Whitepark Road, land at Dundrave, land at Dundrave Road, land north of Dunadrave Road, land at Castlenagree Road, land leading from Castlnagee Road (Terrace Wood), land at the Fingers along Whitepark Road (noted on objectors map)** from the proposed LLPA Designation BSL 04 Dundrave and that the constraints of this LLPA are lessened. The LLPA has been designated to protect the landscape features dominated by the wood and copses of the historic Dundrave Estate. The objector provided no persuasive evidence to demonstrate why these areas of land are not important to this landscape area or how the constraints of the proposed LLPA could be lessened. The removal of each of these sites individually or cumulatively would threaten the integrity of the proposed designation that seeks to protect the landscape setting of Dundrave Estate. Accordingly the objections are not sustained.

5.2.55 Objection 4366 seeks the removal of land at **Bushmills Holmes** from the proposed LLPA Designation **BSL 05 Bushfoot** and that the constraints of this LLPA are lessened. The LLPA has been designated to protect the landscape features of the River Bush. The objector provided no persuasive evidence to demonstrate why this area of land was not an important feature of this landscape area or how the constraints of the proposed LLPA could be lessened. The removal of this large site from this proposed LLPA would threaten the integrity of the proposed designation. Accordingly the objections are not sustained.

5.2.56 Objections 4487 to the proposed LLPA designation **BSL 05 Bushfoot** seek the replacement of the paragraph 9.6 so that the LLPA would facilitate the development of the proposed Hotel and Golf Resort Development. We are aware that this development has been approved, however we consider that paragraph 9.6, page 307, Volume 2 in its current form would allow development that is essential, modest and necessary for public infrastructure. We are not persuaded that there is an overriding need to amend the supporting text to facilitate an individual development proposal. A second element of this objection is to reduce the boundary of the proposed LLPA to exclude an area of farmland north of the River Bush and west of Whitepark Road, and the River Bush Dunes SLNCI. The justification given by the

objector is that this area is already protected by an AONB designation. The proposed LLPA has been designated to protect the integrity and character of the landscape quality in this area. The area noted by the objector to be removed from the proposed designation makes an important contribution to the landscape setting around the River Bush and the setting of Bushmills. We are not persuaded that it should be removed from the proposed designation. The AONB designation is not sufficient of itself to protect the landscape setting in this area. Accordingly we are not persuaded that the boundary of this proposed LLPA should be amended.

5.2.57 Objection 5598 was to the inclusion of the proposed Golf Resort within the proposed LLPA designations at Bushmills. The objection was not substantiated with any supporting evidence to justify an amendment to any of the proposed LLPA designations.

### **Recommendations**

5.2.58 **We recommend:**

- **The removal of land relating to planning permissions E/2008/0094/RM and E/2005/0364/RM from the proposed LLPA Designation BLS01 Montalto.**
- **Paragraph 94, page 308, Vol 2 should read as follows:**  
  
**“Within the development limit well designed buildings, complementing the traditional built character of the Distillery, may be acceptable.”**

### 5.3 CUSHENDALL

- 5.3.1 The plan designates Cushendall as a town. The SDL for the settlement is shown on Map 5/03 of the plan.

#### **Plan Provision for Housing**

- 5.3.2 Taking account of the 2008 HGI revision for Moyle District the draft plan makes provision for 214 residential units in Cushendall. Between January 1999 and August 2010 some 102 housing units were completed and that the settlement has further capacity for some 101. The March 2011 Housing Update Figures indicated the settlement had capacity for a further 101 units leaving a potential deficit of 11 residential units below the plan allocation.

#### **Social Housing**

- 5.3.3 At the EIP the NIHE stated that for Cushendall the updated figures for March 2011 indicated an increase in the social housing need of 35 residential units over 7 years (2018). The NIHE had been in discussions with the Department to identify suitable land for the inclusion of residential units to meet the social housing needs for Cushendall. This land would have to be subject to a KSR restricting its development for the needs of social housing.

#### **Settlement Development Limits**

- 5.3.4 We concluded in section one of our report (para 1.4.45) that while Cushendall was unlikely to experience a shortfall of housing provision in general at the end of the plan period there was the possibility of a shortage of social housing provision. It is within this particular context and in the context of urban form arguments that we shall consider objections seeking the inclusion of land within the SDL for housing.
- 5.3.5 Objection 11 and part of objection site 5750 relate to some 1.25 hectares of land **between Kilnadore Road and Kilnadore Park**. The objection relates to a rectangular portion of land which is accessed via a private laneway along its northern boundary. Access to the land can also be achieved through the adjacent housing development at Kilnadore Park. The site is located within the proposed LLPA designation CLL 01 Court McMartin and the plan recognises the scheduled archaeological monument relating to Kilnadore Graveyard. The Department suggested that this would be suitable site for inclusion for social housing within the SDL as it represents a logical rounding off at the edge of the settlement. At the EIP the objector was present and expressed a willingness to accept social housing on his land. The archaeological monument is already a Scheduled Monument, and this therefore affords it legislative protection. This combined with mitigation measures requiring a maintenance buffer around the archaeological site would permit the balancing of the environmental constraints with the development needs for the settlement. This buffer could form part of the open space for the housing development on the site. We accept that this site should be included within the SDL for Cushendall to meet the needs for social housing. It is anticipated that the site could yield around 30 residential units. This would largely meet the anticipated social housing needs identified by the NIHE. We therefore support

the Department's recommendation to include this site within the SDL for Cushendall for social housing purposes.

- 5.3.6 Objection 334 seeks the rezoning of land along the **Coastline overlapping the caravan park at Gortaclee Road north and south and Dalriada Park and land including the Caravan Park at Kilnadore Road and the land to the south**. 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 settlement limits. There are no site specific arguments that would persuade us that this land should be rezoned for housing.
- 5.3.7 Objections 334 seeks the inclusion of the caravan parks at **89 Middlepark Road and east of St Aloysius High School** within the SDL as they provide an important tourist facility for the settlement. The exclusion of this land from the SDL does not preclude its continued operation as a tourist facility.
- 5.3.8 Objection 334 on land to adjacent to **2 Ballyemon Road** is a road side plot on approach into the settlement from the west. A small Ulsterbus parking depot exists on the site, which is substantially surrounded by mature vegetation and trees. The site falls within the conservation area. The tree cover and vegetation on the site makes an important contribution to its setting and context of the settlement and the Conservation Area. The site also lies within the proposed LLPA CLL01 Court McMartin. Development on this land would result in urban sprawl occurring along Ballyemon Road. Accordingly we are satisfied that this land should remain outside the SDL.
- 5.3.9 Objections 334 relates to the inclusion of a large field **south west of St Mary's Church**. The objection site is bounded to the north east by the River Dall to the north and Ballyemon Road to the south. Part of the field is located within the floodplain. The river represents a physical boundary to the edge of the settlement to the south west. The inclusion of this land within the SDL would breach this natural physical boundary at this location. When viewed along Ballyemon Road the land is not physically linked to the settlement. Its inclusion in the SDL would give rise to urban sprawl along this road failing to result in a compact urban form. The inclusion of this site would also have an impact on the setting and visual approach for Cushendall and the Conservation Area at this location. It is therefore appropriate that this land remains outside the SDL.
- 5.3.10 Objection 334 on land **north of Ballyemon Road** relates to a large road side field bounded to the north by the River Dall and to the south by the Ballyemon Road. This site is within the Conservation Area. The land is low lying and the northern part of the site falls within the flood plain. The river provides a physical boundary to this part of the settlement and the inclusion of this land would breach this boundary giving rise to the appearance of urban sprawl. Given the sites constraints it is appropriate that this land should remain outside the SDL.
- 5.3.11 Objection 334 on land **opposite St Mary's RC Church on Chapel Road** relates to a small portion of road side land which is already occupied by one dwelling. The road bends at this location and the land rises steeply to the rear both combining to frame the site in its context. The land is within the

Conservation Area. Any development on this land would be subject to meeting the requirements of the Conservation Designation. Development on this site would be small scale following the existing roadside pattern of development at this location. We are satisfied that the inclusion of this land would not have a detrimental impact on the setting of the settlement, the setting of the Rath of Court McMartin or the Conservation Area. Access to the site for small scale development can be achieved directly onto Chapel Road We therefore recommend the inclusion of this land within the SDL, but we don't consider that it is necessary that the land should be specifically zoned for housing.

- 5.3.12 Objection 334 on land to the **north of 27 Chapel Road** relates to a small field set back behind the existing road side development along Chapel Road. The site has no direct access to the public road. The land at this location rises up towards the prominent tree crowned Rath of Court McMartin. The land also falls within the Conservation Area. Development on this land would give rise to prominent urban sprawl resulting in the loss of substantial vegetation that provides an important back drop to the development along Chapel Road. Development would also threaten the setting of the settlement, the Rath of Court McMartin and the setting of the Conservation Area. Accordingly this land should remain outside the SDL.
- 5.3.13 Objection 334 on land to the **north of High Street and west of Shore Street** relates to steep, wooded and vegetated land. This area provides an important backdrop to the settlement at this location. The area is also within the Conservation Area and within the proposed LLPA designation CLL03 Faughil. Development on this land would seriously threaten the setting of the settlement and the Conservation Area at this location. Accordingly this land should remain outside the SDL.
- 5.3.14 Objections 334 seek the inclusion of large rectangular field west of **Housing Zoning CLH 12 West of St Mary's Primary School** and a large field to the **west of Kilnadore Brae**. The neighboring housing land to the east of both objection sites are not complete and provide a logical uniform edge to this side of the settlement. The inclusion of either objection site would give rise to the appearance of urban sprawl into the open exposed landscape at this location. Accordingly we do not favour the inclusion of these sites within the SDL.
- 5.3.15 Objection 334 and part of objection site 5750 relate to land west of **15 Kilnadore Road**. The inclusion of this flat area land to the outside of the southern boundary of the Conservation Area would give rise to a significant outward expansion to the west side of the settlement. Its inclusion would therefore fail to provide a compact urban form at this location.
- 5.3.16 Objection 334 relates to **the rear The Glens Hotel** which is part of an operational golf course. The land now falls within the proposed LLPA designation **CLL 02 Golf Links**. This area is important to the coastal setting of the settlement and we would not favour the expansion of the settlement in this area.
- 5.3.17 Objections 334 seeks the inclusion of two separate adjoining sites to the **west of Housing Zoning CLH 13 adjoining 67 Middlepark Road and a site on land to the rear 9-10 Middlepark Road** within the SDL for housing. Part of

objection site 5618 overlaps this land along Middlepark Road. The pattern of development to the west of Middlepark Road is defined by roadside development sharing a common rear boundary. The inclusion of either site would result in an illogical urban protrusion to the west. It is appropriate these three sites remain outside the proposed SDL.

- 5.3.18 Objection 334 relates to a small site to the rear of **64-68 Middlepark Road**. Objection 4986 seeks the inclusion of site 334 and the adjacent field and objection site 5618 seeks the inclusion of some 4.2 hectares of land overlapping objection site 344 and the Caravan Park along Middlepark Road. Objection 5756 refers to this area but failed to provide a map to show the extent of their objection site. Objection site 334 is bounded by development to its northern boundary at Bellisk Drive and to the west by development along Middlepark Road. The Department stated that this would be the second preference to meet the social housing needs and that this site could yield up to 22 residential units relating to objection 334. However, the objector was not present at the EiP to express a willingness to provide this land for social housing. Likewise we are not persuaded there is a need to include the entire site relating to objections 4986 or 5618. The issues relating to the inclusion of Caravan Parks is set out in section 1 of our report (paragraph 1.3.62) whereby we concluded that peripheral caravan parks should be left outside settlement limits. Accordingly none of these objections are sustained.
- 5.3.19 Objections 334 relates to three separate portions of land **south and west of 47 and 49 Middlepark Road**. Part of objection site 5618 also relates to this area of land. The area surrounds a large farm complex on the edge of the settlement and is unrelated to the surrounding urban context. The pattern of development to the west of Middlepark Road is defined by road side development sharing a common rear boundary. The inclusion of each site individually or cumulatively site would give rise to an illogical protrusion to the west from the established development pattern of development. These three sites should remain outside the proposed SDL.
- 5.3.20 Objection 334 relates to land south of the **Boat House along Coast Road** which fronts the coast to the east of the settlement and is an important area of land when approaching the settlement from the south. Its inclusion would give rise to detrimental linear expansion along Coast Road. We do not support the inclusion of this land within the SDL.
- 5.3.21 Objection 334 on land at **77 Middlepark Road** relates to most southern point of the settlement. The land fronts onto the caravan park along Middlepark Road. The inclusion of this land would give rise to detrimental linear expansion along Middlepark Road, which would threaten the setting of the settlement at this location. We do not support the inclusion of this land within the SDL.
- 5.3.22 Objection 334 relates to two large fields to the **west side of Coast Road**. The elevation and topography of this landscape assimilates the settlement into the countryside along the Coast Road. The inclusion of this area of land would give rise to prominent development expanding southwards that would result in detrimental urban expansion along Coast Road. We do not support the inclusion of this land within the SDL.

- 5.3.23 Objection 4370 seeks the designation of the site of the **former Dalriada Hospital** for development. The objector did not provide any map to indicate the land to which the objection related to. Nor did they provide a reference number for the planning history to which the objection also refers. The former hospital was located on land close to the now existing Golf Club. The site is physically separated from the settlement and would therefore not represent a logical expansion to the settlement. Accordingly the objection is not sustained.
- 5.3.24 Objection 5618 relates to a large area of land **north of High Street, Fairhill and West of Shore Street**. This area is steep and generally wooded and provides an important backdrop to the settlement as well as a number of listed and locally significant buildings. We are satisfied that this land should remain outside the SDL.
- 5.3.25 Objections 5618 and 5750 relates to land east of **Cairns Road and north of Glenville Crescent**. The site is physically divorced from the settlement and sits in the open countryside. Its inclusion within the SDL would be illogical and would fail to provide a compact settlement for Cushendall.
- 5.3.26 Objection 5750 relates to three road side fields along **Fairhill** and objection 5790 seeks the inclusion of one road side triangular field adjacent to objection site 5750. Both objection sites are physically divorced from the settlement and sit in the open countryside. The inclusion of roadside land at this location would give rise to urban sprawl along Fairhill. The inclusion of these sites within the SDL would be illogical and would fail to provide a compact settlement for Cushendall.

### **Recommendations**

- 5.3.27 **We recommend:**
- **The inclusion of objection site 11 and part of objection site 5750 within the SDL for Cushendall to meet the development needs of the settlement to provide social housing.**
  - **The inclusion of objection site 334 on land opposite St Mary's RC Church on Chapel Road within the SDL.**

### **HOUSING ZONINGS**

- 5.3.28 The main issues relate to:
- (a) the zoning of Housing Land; and
  - (b) The KSR should be amended.

### **The Zoning of Housing Land**

- 5.3.29 Objection 334 to **Housing Zonings CLH 01 7 Bridge Street, CLH 02 Middlepark Crescent, CLH 03 West of St Mary's School, CLH 04 Bellisk Drive, CLH 05 South of 60 Middle Park Road, CLH 06 Adjoining 26 Middlepark Road, CLH 07 Between 22 and 24 Shore Street, CLH 08**

**Between 2 and 5 Coast Road, CLH 09 4 Kilnadore Road, CLH 10 adjoining 46 Coast Road, CLH 12 West of St Mary's Primary School, CLH 13 Adjoining 67 Middlepark Road**, on the basis these sites, along with the other proposed housing zonings, are inadequate to meet the overall provision for housing for Cushendall. These objections were not substantiated.

#### **The KSRs should be Amended**

- 5.3.30 Objection 334 to KSR 2 of **Housing Zoning CLH05 South of 60 Middlepark Road** on the basis that additional lands should have been included in this zoning to permit satisfactory access. This housing zoning relates to a small 0.09 hectares of land and fronts onto the Middlepark Road. The objector has not provided any persuasive evidence to demonstrate how this KSR would result in the failure of the plan to deliver housing on this site. Accordingly the objection is not sustained.
- 5.3.31 Objection 334 to KSR 2 of **Housing Zoning CLH 07 Between 22 and 24 Shore Street** on the basis that additional lands should have been included in this zoning to permit satisfactory access. This housing zoning relates to a small 0.05 hectares of land and fronts onto the Shore Street. The objector has not provided any persuasive evidence to demonstrate how this KSR would result in the failure of the plan to deliver housing on this site. Accordingly the objection is not sustained.
- 5.3.32 Objection 334 to KSR 3 of **Housing Zoning CLH 08 Between 3 and 5 Coast Road** on the basis that additional lands should have been included in this zoning to permit satisfactory access. This housing zoning relates to a small 0.12 hectares of land and fronts onto the Coast Road. The objector has not provided any persuasive evidence to demonstrate how this KSR would result in the failure of the plan to deliver housing on this site. Accordingly the objection is not sustained.
- 5.3.33 Objection 334 to KSR 2 of **Housing Zoning CLH 09 4 Kilnadore Road** on the basis that additional lands should have been included in this zoning to permit satisfactory access. This housing zoning relates to a small 0.08 hectares of land and fronts onto the Kilnadore Road. The objector has not provided any persuasive evidence to demonstrate how this KSR would result in the failure of the plan to deliver housing on this site. Accordingly the objection is not sustained.

#### **INDUSTRY, BUSINESS AND DISTRIBUTION**

- 5.3.34 The main issues relate to the zoning of Industrial land.
- 5.3.35 Objections 334 to **Industrial Zoning CLI 02 Gortaclee Road** on the basis this site does not fully meet the needs of the population for Cushendall was not substantiated with any evidence or supported with other potential sites for industrial zonings in the plan. This objection is not sustained.

- 5.3.36 Objection 5647 is to the failure of the plan to zone land for industry to attract inward investment. The plan has made provision for industrial land in Cushendall. This objection is not sustained.
- 5.3.37 Objection 5618 to **Industrial Zoning CLI 02 Gortaclee Road** on the basis that planning permission for offices and light industry has been granted on this land. The objector stated that this planning history was an indication that not enough land has been zoned in the settlement for industry. The Department stated that the take up of industrial land in Cushendall has been very slow with some 69% of zoned industrial land remaining undeveloped. This slow up take of land combined with the objectors failure to identify other suits for industry means this objection is not sustained.

### **DISTRICT CENTRE**

- 5.3.38 The plan identified a District Centre for Cushendall on Map 5/03. The main issues raised relate to the designation of the District Centre.
- 5.3.39 Objection 334 to the proposed **Designation CLDC Cushendall District Centre** was made on the basis that the designation does not accurately reflect the area required to be in district centre. The objector, however, presented no justification or evidence to persuade us that the Department should relook at the definition of the boundaries. The Department did, however, request that the title of the designation be amended to that of ‘town centre’ instead of district centre. We accept this is consistent with the requirements set out in PPS 5 for the designation of town centres within a development plan and recommend so accordingly.
- 5.3.40 Objection 5618 seeks the expansion of **Cushendall Town Centre** to allow greater scope for economic development in the village. The Department stated that the town centre boundary has been drawn to mainly exclude all significant areas of housing to protect the residential environment. The objector failed to substantiate their objection with evidence indicating what areas should be included within the town centre boundary. Accordingly the objection is not sustained.
- 5.3.41 Objection 5757 to the exclusion of housing from the town centre in Cushendall and the failure of the plan to refer to Living Over The Shops (LOTS) was unsubstantiated in the context of Cushendall. The objector provided no evidence to suggest how the town centre boundary could be amended to overcome their objection. Regardless of the objection the issue of LOTS is dealt with within the strategic part of our report.

### **Recommendations**

- 5.3.42 **We recommend:**
- **That Designation CLDC 01 Cushendall District Centre should be amended to refer to Cushendall Town Centre.**

## OPEN SPACE & COMMUNITY RECREATION

- 5.3.43 The plan identifies major areas of existing open space in Cushendall for information purposes. These are shown on Map 5/03. The main issues raised relate to the non designation of land for open space or community recreational use.
- 5.3.44 Objections 4643, 5647 & 5750 relate to the closure of **St Aloysius Secondary School** and the associated land becoming redundant. The objections seek that the plan zones this land for community/education or recreational use. The school is now closed but the building is now used for community use as a youth club and the playing fields appear still to be in use. The plan has not zoned any land for Community Use in Cushendall. Any change of use to this land would be subject to planning permission where the local community would be consulted. We are not persuaded there is a need to specifically zone this land.
- 5.3.45 Objection 5618 to the non designation of **St Aloysius High School** as a major area of open space on the basis that the land is now vulnerable to development pressures. The objector also seeks that this land is designated for Education/Civic or Community use. The school is now closed, but the Department stated that the building is now used for Parish activities. The playing fields constitute an area of white land in the plan which already benefits from protection afforded by PPS8 under Policy OS1. We are satisfied there is no need to designate these playing pitches for open space in the plan, especially as the school is located opposite a major area of open space, which includes 'Paire Mahure' St Mary's Gaelic Grounds. The objector failed to provide persuasive evidence to demonstrate a need for more open space or how this land would be maintained and managed if it were designated as open space. Any change of use to this land would be subject to planning permission where the local community would be consulted. We are not persuaded that there is a need to specifically zone this land for either use. Accordingly the objection is not sustained.
- 5.3.46 Objection 5618 to the non inclusion of land known as **Cottage Wood** for tourism and recreation in the plan. This area of land comprises an existing woodland forming part of an important setting to the town now within a proposed LLPA CLL03 Faughil. The plan has not actively zoned any land for tourism and recreation. The inclusion of this land within the SDL for this purpose would result in development pressure and would conflict with the plan objectives of protecting tourism resources by leaving them outside the SDL. We conclude that this land should not be designated for tourism purposes within Cushendall.

## AREA OF ARCHEALOGICAL POTENTIAL

- 5.3.47 An area of Archaeological Potential has been identified in Cushendall on Map 5/03. 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)**

- 5.3.48 The plan identifies four LLPA around Cushendall. The main issues relate to the scale and size and the designation of the LLPA.
- 5.3.49 Objection 11 seeks the removal of the site from the proposed **LLPA Designation CLL 01 Court McMartin**. The Department recognises that if this land is required to meet the social housing needs for the settlement, with exception to the area identified at the Kilnadore Graveyard, it would be appropriate to remove the remaining part of the objection site from the LLPA. We support the Departments recommendation.
- 5.3.50 Objections 334 to the proposed LLPA Designations **CLL 01 Court McMartin, CLL02 Golf Links, CL03 Red Bay and CLL04 Red Bay** on the basis that these designations do not accurately reflect the area to be protected. The boat club, car park and toilet facilities provide tourist facilities in this area. The sewage treatment works is located within part of the coastal setting for Cushendall, which is recognised in CLL02. It would not be logical to exclude this small area from the overall LLPA area. The objections were not supported with any persuasive evidence or maps to suggest what areas should or should not form part of the LLPA. Accordingly the objections are not sustained.
- 5.3.51 Objection 334 to the proposed LLPA Designation **CLL02 Golf Links** on the basis that this area is not worthy of protection, was not substantiated with any evidence to justify the objection. Accordingly it is not sustained.
- 5.3.52 Objection 4986 is to the LLPA designations of CL01- CL04 in the plan. However no evidence was presented to substantiate these objections.

### **Recommendations**

- 5.3.53 **We recommend:**
- **The removal of the proposed LLPA Designation CLL 01 Court McMartin from objection site 11, with exception to the area around Kilnadore Graveyard.**

## 5.4 ARMOY

- 5.4.1 The plan reaffirms the status of Armoyn a village. The SDL for the settlement is shown on Map 5/04 of the plan.

### Plan Provision for Housing

- 5.4.2 Taking account of the 2008 HGI revisions for Moyle District the draft plan make provision for 70 residential units in Armoyn. Between January 1999 and August 2010 some 50 housing units were completed. The settlement has a remaining capacity for some 39 residential units. The housing Up-date Figures Paper March 2011 estimated a surplus of some 19 units (27.1%) above the plan allocation for Armoyn. It is not necessary to include additional land for housing in the SDL

### Social Housing

- 5.4.3 There was no social housing need presented for Armoyn.

### Settlement Development Limits

- 5.4.4 We concluded in section one of the report that there is no strategic need to allocate further housing land in Armoyn. 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 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 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 Armoyn.
- 5.4.5 Objection 4537 raised concerns about the failure of the SDL to provide for mixed areas for Protestants and Catholics to be integrated and to flourish within the proposed SDL. Nonetheless the objector failed to identify any sites to address such issues. Accordingly, there is no need for further lands to be rezoned or included within the settlement limit on that basis. Our assessment of the objections in Armoyn is as follows.
- 5.4.6 Objections 334 and 5704 relate to land opposite **150 Hillside Road to the north** of the settlement. The objection site is a large rectangular field that fronts onto Hillside Road, which is a protected route. It rises to the west up to housing at Dean Park. The site lacks mature vegetation around the boundaries. Given the topography and lack of vegetation around the site development on this land would appear prominent on approach to the settlement from the north. This would give rise to the appearance of urban sprawl. This land should not be included in the SDL.
- 5.4.7 Objection 334 relates to land to the east of **Bush River**. With exception of a small area of land to the north west corner of the site, the majority of the land

appears to be is physically detached from the SDL. Accordingly this site would not present a logical inclusion within the SDL.

- 5.4.8 Objection 334 on land **south of Glenshesk Road** does not abut the roadside because of the steep road side embankment. The site falls within the proposed LLPA for the village. The topography in this area provides an important backdrop and a sense of enclosure for the settlement along Glenshesk Road. The inclusion of this site within the SDL would result in an outward expansion of the settlement that would have a detrimental impact on its setting. It should not be included in the SDL.
- 5.4.9 Objections 334 and 4986 relates to some 2.45 hectares of land **east of Hillside Road**. The site is a large roadside field, which rises gently up from Hillside Road. The Hillside Road runs along the east side of the settlement and contains most of the settlement to the west side of the road. The inclusion of this land would further expand the settlement across the road resulting in urban sprawl. Accordingly we agree this land should remain outside the SDL.
- 5.4.10 Objection 334 on land to the **opposite St Olcan's Primary School and to the rear of 158 Hillside Road** is a large rectangular road side field. Objection 5618 relates to a small area to the south west corner of the field. With the exception of some small scale dwellings and buildings, development in Armoy is generally contained to the west side of Hillside Road. The inclusion of the larger site would extend development to the east side of Hillside Road. This would give rise to further urban sprawl. However, the small site as indicated by objection 5618 relates to a hard cored yard used to store buses and for the provision of recycling banks. The appearance of this land relates more to the urban form rather than the countryside at this location. We accept the Departments view that the inclusion of this small area within the SDL as un-zoned land would be appropriate at this location. We are satisfied that objection site 334 should remain outside the SDL and that objection site 5618 should be included within the SDL as white land.
- 5.4.11 Objections 334 and 5183 relate to 1 hectare of land **north of Turnarobert Park**. Objection 4879 also relates to four field parcels of land north of Turnarobert Park. The first field parcel immediately north of the settlement is enclosed by development on three sides along Hillside Road, Turnarobert Park and Station Road. The inclusion of this site presents a logical rounding off to the edge of the settlement. The inclusion of such a small site would not impact on the scale of the settlement. Given the concerns raised in planning application E/2006/0044, in respect of the access to the site, we consider it would not be appropriate to zone the site for housing. We are though satisfied that the inclusion of the site with the SDL would be logical in terms of the overall urban form of the village. With regard to the remaining land indicated by objection 4879 to be included within the SDL, we consider that this would give rise to significant expansion to the northern part of the settlement that would not maintain a compact urban form. Accordingly there is no justification for the inclusion of this part of the objection site within the SDL.
- 5.4.12 Objections 334 and 5618 seek the inclusion of **land south of Fairhill Street and north of Bush River** within the SDL for housing. We accept that there is some logic to the inclusion of this land within the SDL in terms of rounding off

the edge of the settlement at this location. However almost 50% of the site is within the flood plain and for this reason would present a major constraint to the development of this land. We do not therefore support the inclusion of this land within the SDL.

- 5.4.13 Objection 334 relates to a large rectangular field south of **Housing Zoning AYH 06 south of Carrowreagh Road**. The south west boundary of this land abuts the Sewage Treatment Works for the town. The inclusion of this land would represent a significant expansion to the settlement failing to create a compact urban form.
- 5.4.14 Objections 334 and 4986 relates to road side land south of **Housing Zoning AYH 08 along Drones Road**. The inclusion of this land within the SDL would give rise to a significant outward expansion to the south of the settlement, failing to provide a compact urban form at this location.
- 5.4.15 Objection 334 relates to road side **land south of Carrowreagh Road**. The inclusion of this land would give rise to a significant expansion to the west side of the settlement, failing to provide a compact urban form at this location. The majority of this land does not adjoin the proposed SDL and would represent an illogical edge to the settlement.
- 5.4.16 Objection 334 relates to roadside land **north west of Carrowreagh Road and Dean Park**. The inclusion of this land would give rise to a significant expansion to the north west of the settlement, failing to provide a compact urban form at this location. This land also falls within the area of Mineral Constraint.
- 5.4.17 Objection 4943 is on some 3.6 hectares of land at **Gracehill Road and west of The Ferns** and relates to a rectangular site located to the south west side of the village and runs alongside Army Primary School. The site is relatively free from any environmental constraints. Access to the land could be part taken through the Ferns and partly onto Gracehill Road, subject to meeting the Departments Road Safety standards. Despite the locational benefits of this site in close proximity to the Primary School and the village centre, there is no overriding need for additional land irrespective of the housing density on the site to meet the housing requirements for the village. Accordingly this land should remain outside the SDL.
- 5.4.18 Objection 5704 relates to some 5 hectares of land **east of Drones Road and south of the proposed LLPA Designation AYL 01**. The inclusion of a site of this scale and size to the east side of Drones Road would represent a significant expansion to the settlement. It would conflict with the plan objectives of the creation of compact urban forms. The north east part of the site is bounded by the Bush River corridor and falls within the flood plain. The development of the site would be constrained by archaeological remains and environmental sensitive landscape on approach to the settlement. Access would also be onto a protected route. Given the combination of scale and constraints relating to the site there is no justification for the inclusion of this land within the SDL for Armoy.

## Recommendations

### 5.4.19 We recommend:

- The inclusion of objection site 5618 on land opposite St Olcan's Primary School within the SDL as un-zoned white land.
- The inclusion of objection site 334, 5183 and part of objection site 4879 on land immediately north of Turnarobert Park within the SDL as un-zoned white land.

## HOUSING ZONINGS

5.4.20 Objection 334 is to **Housing Zonings AYH 01 Adjacent to Church Road, AYH 02 Fernmount Park, AYH 03 Junction of Turnarobert Park and Market Street, AYH 04 Rear of 5 Main Street, AYH 05 Rear of 11-13 Main Street, AYH 06 Junction of New Street and Carrowreagh Road, AYH 07 New Street, AYH 08 Rear of 19 & 21 Drones Road**, on the basis these sites, along with the other proposed housing zonings, are inadequate to meet the overall provision for housing for Armoyle. These objections were not substantiated.

5.4.21 Objection 334 to KSR 2 of **Housing Zoning AYH 04 rear of 5 Main Street BAH 01 9 Main Street** on the basis that this site may require additional lands to be provided and access from the Main Road. This site is now developed for housing. Accordingly the objection is not sustained.

## AREA OF VILLAGE CHARACTER

5.4.22 The plan designates an Area of Village Character as shown on Map 5/04. Objections 334 to the proposed **Designation AYV 01 Area of Village Character** argued that this area should be re-evaluated. However the objector presented no justification or evidence to demonstrate why the Department should relook at this designation. Accordingly the objection is not sustained. Objection 5722 to the proposed **Designation AYV 01** was unsupported with evidence to explain their objection. Objection 5757 seeks that proposed **Designation AYV 01 Area of Village Character** is supported by legislation. Any Listed buildings within the AVC have legislative support irrespective of the proposed designation while PPS6 sets out regional policy to support this designation.

## LOCAL LANDSCAPE POLICY AREAS

5.4.23 Objection 334 is to the proposed LLPA **Designation AYL 01 Bush River** on the basis of the entirety of land included within the designation. The objector stated that not all the proposed land within the designation was worthy of such protection. The objection was not supported with any evidence or maps to suggest what areas should not form part of the LLPA. Accordingly the objection is not sustained.

## 5.5 BALLINTOY

- 5.5.1 The plan upgrades the status of Ballintoy from a Hamlet as designated in the NEAP to a village. The SDL for the settlement is shown on Map 5/05 of the plan.

### Plan Provision for Housing

- 5.5.2 Taking account of the 2008 HGI revision for Moyle District the draft plan makes provision for 21 residential units in Ballintoy. Between January 1999 and August 2010 some 5 housing units were completed. The settlement has a remaining capacity for some 41 residential units. The housing Up-date Figures Paper March 2011 estimated a surplus of some 25 units (119%) above the plan allocation in Ballintoy. It is not necessary to include additional land for housing in the SDL.

### Social Housing

- 5.5.3 There was no social housing need presented for Ballintoy.

### Settlement Development Limits

- 5.5.4 We concluded in section one of the report that there is no strategic need to allocate further housing land in Ballintoy. 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 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 Ballintoy. Our consideration of the objections is as follows:

- 5.5.3 Objection 334 on land **north of Knocksoghey Lane** relates to a large flat area now occupied by some farm dwellings and buildings which have been included within the proposed SDL. Further residential development so close this farm could present neighboring conflicts. The inclusion of all this land would also further extend the settlement to north east. There is no logic for the inclusion of this land within the SDL.
- 5.5.4 Objection 334 on land along the entire **southern boundary of the settlement** relates to a large area of land which rises up and provides an important backdrop to the southern edge of the settlement. The inclusion of all this land within the SDL would further extend the settlement to south east leading to unnecessary urban sprawl that would be visually prominent.
- 5.5.5 Objection 334 relates to land to the south east of the SDL and to the south side **of Whitepark Road**. A covered reservoir is also located to the south east part of the site. The site if included within the SDL would result in an

unacceptable intrusion into the surrounding countryside, failing to result in a compact urban form.

- 5.5.6 Objections 334, 4758, 5587 & 5618 relate to land **west of 68 Main Street and Larrybane Park**. The rising topography of the site elevated above the level of the road provides a physical edge to the settlement. The boundary vegetation also assists in marking the edge of the settlement at this location. The inclusion of either objection site would further extend the settlement in a linear form along Whitepark Road. This would fail to provide a compact urban form for Ballintoy. We are satisfied that this land should remain outside the SDL.
- 5.5.7 Objection 334 on land to the **north of Main Street** relates to flat open land taking in part of two large fields. The openness of this area allow views from the settlement towards the coastline. Given the openness of the landscape in this area, the inclusion of large areas of land within the SDL would give rise to unacceptable urban sprawl that would impact on the setting of the settlement.
- 5.5.8 Objections 334 and 4986 relate to land **opposite Larrybane Park**. Objection 334 includes three separate roadside plots whereas objection 4986 relates to a large rectangular field running back from Whitepark Road. The land is flat and open and permits extensive views from the settlement to the northwest towards Ballintoy Harbour and the Coast. Given the openness of the landscape in this area, the inclusion of large areas of this land within the SDL would create urban sprawl that would impact negatively on the setting of the settlement.
- 5.5.9 Objection 334 on land to the **rear of 41-33 Main Street** relates to an area of backland development. Its inclusion would give rise to further expansion into the openness of the surrounding countryside resulting in urban sprawl.

## HOUSING ZONINGS

- 5.5.10 The main issues relate to:
- (a) The zoning of housing land; and
  - (b) The KSR.

### Zoning of Housing Land

- 5.5.11 Objection 334 is to **Housing Zonings BAH 01 9 Main Street, BAH 02 land west of St Joseph's RC Church, BAH 03 lands to the rear of the Gospel Hall, BAH 04 rear of dwelling at Knocksohney Road & BAH 05 129 Whitepark Road** on the basis these sites along with the other proposed housing zonings are inadequate in the overall provision for housing in Ballintoy were not substantiated.

## The KSRs

- 5.5.12 Objection 334 to KSR 4 of **Housing Zoning BAH 01 9 Main Street** on the basis that this site may require additional lands to be provided and access from the Main Road. This housing site abuts the main road. The objection was not supported with any evidence to substantiate the objection.
- 5.5.13 Objection 334 to **Housing Zoning BAH 02 land west of St Joseph's Church** on the basis that KSR1 relating to the density does not reflect the land use and character in this area, in that the site would not deliver enough housing. High density development is not characteristic of the central area of Ballintoy. The objection was not supported with persuasive evidence to substantiate the objection.
- 5.5.14 Objection 334 to KSR 1, 2 & 3 of **Housing Zoning BAH 03 lands to rear of Gospel Hall** on the basis that these would restrict the potential development of the site. These objections were not supported with persuasive evidence to demonstrate how the KSR would restrict the potential of this housing zoning.
- 5.5.15 Objection 334 to KSR2 of **Housing Zoning BAH 05 129 Whitepark Road** on the basis that this site may require additional lands to be provided to access from the Main Road. This housing site is set back from the public road. The objection was not supported with any persuasive evidence to substantiate the objection.

## AREA OF ARCHAEOLOGICAL POTENTIAL

- 5.5.16 An area of Archaeological Potential has been identified in Ballintoy on Map 5/05. 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 (LLPA)

- 5.5.17 The plan designates three LLPA around Ballintoy, these are shown on Map 5/05. The main issues relate to the designation of these LLPA.
- 5.5.18 Objections 334 to the proposed **Designations BAL 01 Ballintoy Harbour & BAL 03 Ballintoy LLPA** on the basis of the areas designated do not accurately reflect the areas required to be protected. These objections were not supported with any evidence or maps to suggest what areas should form part of these landscape designations. Accordingly the objections are not sustained.
- 5.5.19 Objections 331 to the overlap of the proposed **LLPA Designation BAL 02 Boheeshane Bay** on housing zoning BAH 05 129 Whitepark Road. The objection also seeks the designation of more housing land to compensate for the areas that these designations relate to. We do not consider that this

objection warrants the zoning of more housing land but recommend that the supporting text in paragraphs 5.2 and 5.3 relating to Designation of BAL 02 on page 234, volume 2 should take account and take account of land within the SDL including this housing zoning.

- 5.5.20 Objection 4986 seeks the removal of The Castle, Harbour Road from proposed LLPA **Designation BAL 01**. This area forms part of this setting to north west of the village. The objection site is part of the cluster of development along Harbour Road. This area of landscape informs the character of this area. The objectors provide no evidence to suggest why this area should be treated differently from the surrounding landscape. Accordingly the objection is not sustained.

### **Recommendations**

5.5.21 **We recommend:**

- **that the supporting text in paragraphs 5.2 and 5.3 relating to Designation of BAL 02 on page 234, volume 2 takes account of land within the SDL including the housing zonings.**

## 5.6 BALLYVOY

- 5.6.1 The plan upgrades the status of Ballyvoy from a Hamlet in the NEAP to a village. The SDL for Ballyvoy is shown on Map 5/06 of the plan.

### Plan Provision for Housing

- 5.6.2 Taking account of the 2008 HGI revision for Moyle District the draft plan makes provision for 10 housing units in Ballyvoy. Between January 1999 and August 2010 some 34 housing units were completed. The settlement has no remaining capacity. The housing Up-date Figures Paper March 2011 estimated a surplus of some 24 units (240%) for Ballyvoy above the plan allocation. It is not necessary to include additional land for housing in the SDL.

### Social Housing

- 5.6.3 There was no social housing need presented for Ballyvoy.

### Settlement Development Limits (SDL)

- 5.6.4 We concluded in section one of this report that there is no strategic need to allocate further housing land in Ballyvoy. 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 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 Ballyvoy. Our consideration of the objections is as follows:
- 5.6.5 Objections 329, 334, 4983 (a) & 5618 all relate to land west of **St Patrick's RC Church**. This land is on elevated land to the north side of Cushendall Road, adjacent to the church which is a Listed Building. The site would make a logical extension to the SDL given the existence of development immediately opposite this land. Nonetheless, the lack of need for more housing overrides any justification for the inclusion of more land within the SDL. Accordingly this land should remain outside the SDL.
- 5.6.6 Objection 334 relates to land **east of the settlement and south of Blackpark Cottages**. The objection site is one large relatively flat field on elevated land behind existing housing along Blackpark Road. The site lies into the edge of the existing built form. Nonetheless given the status of Ballyvoy within the settlement hierarchy the lack of need for more housing land overrides any justification for the inclusion of more land within the SDL. Accordingly this land should remain outside the SDL.
- 5.6.7 Objections 334, 4447 and 4983 (c) relates to variations in the configuration of land to the **east of Barnish Primary School**. Objection 334 relates to the large roadside field, objection 4447 relates to two fields back from Black Park

Road and objection 4983 (c) relates to two fields, one fronting Ballypark Road and one fronting Cushendall Road. The land in this area rises steeply from Cushendall Road and any development would be visually prominent on this land. The proposed LLPA designation BVL01 seeks to protect the development of this area. The field fronting Cushendall Road would link both parts of the settlement together and if sensitively developed could result in a logical inclusion in the settlement. The field fronting Blackpark Road would further extend development to the north and would sit opposite the existing housing at Blackpark Road. However, none of the objectors disputed the Department's figures or presented any persuasive evidence to demonstrate a need for more housing land in Ballyvoy. The lack of need for more housing land for Ballyvoy overrides any justification for the inclusion of either of these sites.

- 5.6.8 Objection 334 relates to land **north of St Patrick's RC Church**. The inclusion of this land would extend the settlement to the north in to elevated area of landscape. Development on this land would result in visually prominent urban sprawl that would be detrimental to the character of the settlement. This site should remain outside the SDL.
- 5.6.9 Objection 334 relates to land **west of the Gaelic Sports Ground..** The inclusion of this large roadside site land would further expand the settlement to the west resulting in unnecessary urban sprawl along Cushendall Road. We are satisfied that this site should remain outside the SDL.
- 5.6.10 Objection 334 relates to land at **the rear of Hunters Bar and Restaurant**. A small area to the north west of the site relates to the associated car park for the adjacent Bar and Restaurant. The south eastern topography of this land rises up. The inclusion of this land would further expand the settlement resulting in unnecessary urban sprawl along Cushendall Road. We are satisfied that this site should remain outside the SDL.
- 5.6.11 Objection 334 relates to land **south of Cushendall Road**. The site of itself would sit well within the SDL. However, the topography of this area of land falls steeply below the level of the road. A small stream runs through the middle of the site. These constraints would mean that this portion of land would not be best suited to the development of housing. We are satisfied that this site should remain outside the SDL.
- 5.6.12 Objections 4983 (b) and 5618 seek the inclusion of around 1 hectare of land **south of Barnish Primary School** within the SDL for housing. The land falls steeply below the level of the road and lack enclosure to the south. To the south the site is bounded by a stream corridor and associated woodland that makes an important contribution to the setting of the settlement. Development could interfere with this setting at this location. We are satisfied that this site should remain outside the SDL.

## LOCAL LANDSCAPE POLICY AREAS (LLPA)

- 5.6.13 The plan designates two LLPA around Ballyvoy, which are shown on Map 5/06. The main issues raised relate to the designation of the LLPA.
- 5.6.14 Objections 334 to the proposed **BVL 01 St Patrick's and BVL 02 Carey River LLPA** designations were made on the basis that the areas identified do not accurately reflect the areas required to be protected. These objections were not supported with any evidence or maps to suggest what areas should form part of these landscape designations. We cannot give further consideration to this objection.
- 5.6.15 Objections 4983 to the proposed **BVL 01 St Patrick's and BVL 02 Carey River LLPA** designations were not supported with any evidence to justify the objections. No changes should be made to the plan as a result of this objection

## 5.7 MOSS-SIDE

- 5.7.1 The plan reaffirms the status of Moss-side as a village. The SDL for the settlement is shown on Map 5/07 of the plan.

### Plan Provision for Housing

- 5.7.2 Taking account of the 2008 HGI revision for Moyle District the draft plan makes provision for 64 residential units in Moss-side. Between January 1999 and August 2010 some 57 housing units were completed. The settlement has remaining capacity for 115 residential units. The housing Up-date Figures Paper March 2011 estimated a surplus of some 108 units (169%) above the plan allocation for Moss-side. It is not necessary to include additional land for housing in the SDL.

### Social Housing

- 5.7.3 There was no social housing need presented for Moss-side.

### Settlement Development Limits

- 5.7.4 We concluded in section one of this report that there is no strategic need to allocate further housing land in Moss-side. 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 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 Moss-side. Our consideration of the objections is as follows:
- 5.7.5 Objections 334 & 4986 relate to some 1.5 hectares of land at west of **Housing Zoning MEH 04 to the rear of 210 Moycraig Road**, which comprise one relatively large agricultural field. The field is bounded by the SDL on three sides and would present a logical rounding off to the SDL at this location. Nonetheless the over provision of housing land for Moss-side means there is no justification for the inclusion of land of this size and scale within the SDL.
- 5.7.6 Objection 334 relates to land to the rear of **210 Moycraig Road**. The land is relatively flat and is bounded by the Moss-side Water to the east and the Moycraig Road to the west. Agricultural buildings exist to the north west of the site. These buildings are within the SDL. Two dwellings at 214 and 216 Moycraig road are located to the south west of the site. The site would further extend the settlement to the south west result in urban sprawl in this rural area.
- 5.7.7 Objection 334 relates to land **south west of the junction of Moyarget Road and Moycraig Road**. This site is a flat road side field, which sits within the rural context of the settlement. With exception to the development on the

opposite side of both roads, the site has not physical attachment to the settlement. Both roads provide a defining physical edge to the settlement at this location. The inclusion of this land within the SDL would give rise to urban sprawl at this location.

- 5.7.8 Objections 334 and 4640 relate to land **west of Housing Zoning MEH 06 and north of Moyarget Road**. The site would sit well into the existing settlement to the west and south. Neither objector presented any evidence to substantiate a need for an additional land for housing to be included within the SDL, even for lower density housing on the site. The grant of planning permission (C/2003/0203/O & C/2006/0246/RM) for 1 dwelling does not establish the principle of a housing development on this site. Accordingly we agree this land should remain outside the SDL.
- 5.7.9 Objection 334 on land to the **east of 224 Moyarget Road** relates to a large rectangular road side field. The site is bounded by a mature 1 metre hedge around the field. The inclusion of this land would result in a linear expansion to the settlement at this location failing to provide a compact urban form.
- 5.7.10 Objection 334 relates to three fields to the **east of the open space zoning in Moss-side**. The inclusion of this land within the SDL would result in an illogical urban edge to the settlement limits resulting in urban sprawl at this location. There is no justification for the inclusion of this land within the SDL.
- 5.7.11 Objection 334 relates to **land south of Moss-side Gardens along Knockmore Road**. The inclusion of this land within the SDL would result in an illogical linear extension to the urban edge to the settlement limits. There is no justification for the inclusion of this land within the SDL.

## HOUSING ZONINGS

- 5.7.12 The main issues relate to:
- (a) Zoning of Housing land; and
  - (b) The KSRs.

### The Zoning of Housing Land

- 5.7.13 Objections 334 to **Housing Zoning MEH 01 Main Street, MEH 02 Knockmore Road, MEH 03 22 Main Street, MEH 04 19-31 Main Street, MEH 05 42 Main Street and MEH 06 rear of Mill Farm** on the basis these sites along with the other proposed housing zonings are inadequate in the overall provision for housing in Moss-side were not substantiated.
- 5.7.14 Objection 334 to **Housing Zoning MEH 04 19-31 Main Street** on that basis that the proposed designation MEL01 overlaps the housing zoning. Planning permission has been granted on this site and development has commenced. Therefore this proposed designation does not restrict the delivery of housing on this site.

## The KSR

- 5.7.15 Objection 4641 to **Housing Zoning MEH 06 Rear of Mill Farm** on the basis that KSR1 relating to the density on the site should be amended. Planning permission has been granted on this site and is partially built. Accordingly this objection is not sustained.

## LOCAL LANDSCAPE POLICY AREAS (LLPA)

- 5.7.16 The plan designates two LLPA in Moss-side, which are shown on map 5/07. The main issues relate to the designation of the LLPA/

### The Designation of LLPA

- 5.7.17 Objection 4986 to the proposed LLPA **Designation MEL01 Moss-side Water** was not substantiated with any supporting evidence. Objections 334 to the proposed **Designation MEL01 Moss-side Water and MEL02 Moss-side Crossroads** LLPA's on the basis of the areas designated do not accurately reflect the areas required to be protected. These objections were not supported with any evidence or maps to suggest what areas should form part of these landscape designations. We cannot consider these objections further.
- 5.7.18 Objections 334 to the overlap of the proposed LLPA **Designation MEL 01 Moss-side Water** on housing zonings MEH04 and MEH05. The objection also seeks the designation of more housing land to compensate for the areas that these designations relate to. Housing has been approved and is partially built on Housing Zoning MEH04, the objection is not justified in this instance. Housing Zoning MEH05 relates to a small site some 0.22 hectares. The plan does not prohibit the development of housing at this location, but requires account to be given to the LLPA designation. Accordingly these objections are not sustained.

## 5.8 WATERFOOT

- 5.8.1 The plan reinforces Waterfoot as a village. The SDL for the settlement is shown on Map 5/08 of the plan.

### Plan Provision for Housing

- 5.8.2 Taking account of the 2008 HGI revision for Moyle District the draft plan makes provision for 65 housing units in Waterfoot. Between January 1999 and August 2010 some 23 housing units were completed. The settlement has remaining capacity for 57 residential units. The housing Up-date Figures Paper March 2011 estimated a surplus of some 15 units (23.1%) above the plan allocation for Waterfoot. The Department stated that Northern Ireland Water advised that Waterfoot is served by Cushendall Waste Water Treatment Works which has additional capacity available to meet the housing needs in Waterfoot. Accordingly, we accept there is more than sufficient land to sustain the village and it is not necessary to include additional land for housing in the SDL.

### Social Housing

- 5.8.3 At the EIP the NIHE stated that for Waterfoot the updated figures for March 2011 indicated an increase in the social housing need of 6 residential units over 7 years (2018). It is not considered necessary to amend the SDL to accommodate this need.

### Settlement Development Limits

- 5.8.4 We concluded in section one of this report that there is no strategic need to allocate further housing land in Waterfoot. 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 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 Waterfoot. Our consideration of the objections is as follows:
- 5.8.5 Objections 259 and 5168 relate to land to the **north west of Coast Road**. Objection 5168 seeks the designation of this land for tourism. This land is located on elevated land and is physically detached from the edge of the settlement. It also falls with the proposed LLPA Designation WTL 01 which forms part of the dramatic coastline flanking the northern side of Waterfoot and the Glenariff Estuary. The elevation and separation of this land from the proposed SDL means it would not present a logical rounding off to the edge of the settlement but would give rise to urban sprawl. The inclusion of all this land would further extend the settlement to north west. Objector 259 did not dispute the Department's updated housing figures and objector 5186 provided no supporting evidence relating to a tourism need. The plan has not designated

any land for tourism purposes. Without any demonstrated need for more land in Waterfoot there is no justification for the inclusion of either site within the SDL.

- 5.8.6 Objection 300 & 303 relates to land adjacent to **Parkanore Estate and Glenariff River**. The objector stated that it is seeking the inclusion of land for social and affordable housing. Objection 334 also seeks the inclusion of this area of land within the SDL and part of objection site 5618. A revised map in relation to objection site 300 & 303 reducing the size of the site by retaining a buffer area and path way was presented at the EIP. NIHE identified a need for 6 additional residential houses in Waterfoot, but stated that it was not economically viable to develop a site unless it could yield over 8 residential units. The Department stated there is no need for the plan to intervene to meet the needs for social housing in Waterfoot. The amended objection site benefits from the natural enclosure provided by the Glenariff River. A significant proportion of the site is restricted by the flood plain and therefore its inclusion would only yield a small number of residential units on the site. We consider that a flood risk assessment would be necessary to establish the viability of the site. We accept that access for a small number of residential units could be taken through Parkanore Estate. The Department stated that given the limited residential yield possible for the site that this revised site could be included within the SDL. We consider that Regional Policy contained in PPS21 (Policy CTY5) would allow such a site to come forward to meet any social housing needs in Waterfoot. Accordingly this land should remain outside the SDL.
- 5.8.7 Objection 334 relates to two large fields to the south of **Bayview Park**. Objection 4986 relates to the inclusion of the front road side field overlapped by objection site 334. This site lies within a flat and open landscape and its inclusion within the SDL would further extend the settlement form southwards and along Garron Road. Development of this land would also close the visual gap between Waterfoot and the settlement at Glenariff (Bay), giving rise to unacceptable urban sprawl and coalescence. This land should remain outside the SDL.
- 5.8.8 Objections 334 and 5168 relate to land in the **Bay area to the east side of Garron Road** and takes in a large rectangular area. The site overlaps three existing dwellings at 231,233 & 246 Garron Road and a caravan park to the north. The remainder of the site provides an area of open space that permits extensive views of the bay looking out from the settlement. Development of this land would have a significant impact on the setting of Waterfoot and the outlook to the bay. The inclusion of this land would give rise to urban sprawl in this area impacting on the setting of the settlement. This land should remain outside the SDL.
- 5.8.9 Objections 334 and 4986 on land **north west of 1 Glenariff Road** relates to an elevated area of land rising above the road. The land is detached from the settlement and would give rise to urban sprawl at this location. If developed this would have a significant impact on the setting of the settlement contained in the bay area resulting in an illogical edge to the settlement.
- 5.8.10 Objection 334 and part of objection 5186 relate to land to the **south west of Bayview Park**. The identified objection site does not follow the field pattern in

this area and over 50% of the area falls within the flood plain. The objection site relates to an area of backland development. Its inclusion would give rise to further expansion into the surrounding open countryside, resulting in urban sprawl. There is no justification for the inclusion of this land within the SDL.

- 5.8.11 Objection 4694 relates to land between **Glenariff (Bay) and Waterfoot**. The objector failed to provide a map to show the exact area to which the objection relates. However, the inclusion of land between the two settlements would narrow the important visual gap between them and result in unacceptable urban sprawl. This would be inappropriate in this environmentally and visually sensitive coastal area. Accordingly the objection is not sustained.

## **HOUSING ZONINGS**

- 5.8.12 The main issues relate to:
- (a) The Zoning of Housing Land; and
  - (b) The KSRs.

### **The Zoning of Housing Land**

- 5.8.13 Objection 5618 to **Housing Zoning WTH 03 14 Main Street** as housing land on the grounds that this site is not suitable for housing development. The objector seeks that this land is zoned as white land. The Department stated that planning permission was granted on 29/06/09 for the renovation and extension of the existing building to 10 apartments, a café and a shop. Given this planning history we consider that mixed use such as that approved would be suitable for this central location and therefore we recommend the removal of this housing zoning from the plan. This would allow the possibility for alternative uses on this site. Given the overprovision of housing allocation in Waterfoot, the loss of this housing zoning would not compromise the overall housing allocation in the plan.
- 5.8.14 Objection 4617 to **Housing Zoning WTH 05 SW of St Patrick's Primary School** on the basis that the objector considered that this housing site would not come forward for housing purposes. This would result in a shortfall of 35 residential units for Waterfoot. This was supported with a letter from a local estate agent. However, the Department confirmed that outline planning permission E/2004/0208/O was granted in 2004 for housing on this land. Accordingly we are not persuaded that this zoning should be removed from the plan.

### **The KSRs**

- 5.8.15 Objections 334 to KSR 2 of **Housing Zoning WTH 02 & WTH 03 14 Main Street** on the basis that this site may require additional lands to be provided to allow access from Main Street. Both small sites abut the main road which would indicate that access would be physically possible to these zonings. The objection was not supported with any evidence to substantiate the objection.

- 5.8.16 Objection 334 to **Housing Zoning WTH 04 39 Main Street** on the basis that KSR 2 identified that there is insufficient width within the site to provide for turning. This housing zoning is a small narrow plot that fronts onto the Main Street, it is therefore not necessary that the site should provide vehicular access. The KSR is simply identifying a possible constraint to development of the site. The objection is not sustained.

### **Recommendations**

- 5.8.17 **We recommend:**

- **The removal of Housing Zoning WTH 03, 14 Main Street, from the plan**

### **AREA OF ARCHAEOLOGICAL POTENTIAL**

- 5.8.18 An area of Archeological Potential has been identified in Waterfoot on Map 5/08. This area is subject to regional policy as set out in PPS 6. Objection 334 questioned why housing zonings were located in this area. This designation does not prohibit the development of housing on this land. The objection is not sustained.

### **LOCAL LANDSCAPE POLICY AREAS (LLPA)**

- 5.8.19 The plan designates three LLPA in Waterfoot which are shown on Map 5/08. The main issues raised relate to the designation of LLPA.
- 5.8.20 Objections 334 to the proposed Designations **WTL 01 Red Arch LLPA & WTL 02 Glenariff River** on the basis of the areas designated do not accurately reflect the areas required to be protected. These objections were not supported with any evidence or maps to suggest what areas should or should not form part of these landscape designations. Accordingly the objections are not sustained.
- 5.8.21 Objection 4986 to the proposed LLPA Designation **WTL 02 Glenariff River** was not substantiated with any arguments. Objections 300 and 4694 to this proposed LLPA were on the basis that it will restrict development in this area. The designation has been proposed to protect key landscape features attributed to the Glenariff River. Its intention is not to prevent development but to restrict it to a modest scale, sensitively sited and essential for public infrastructure. A planning application would be the only way to establish what is appropriate in this area in conjunction with the restrictions for the area. Accordingly we are not persuaded that this LLPA should be removed from the plan for this reason.
- 5.8.22 Objection 4563 to the proposed LLPA Designation **WTL 03 Glenariff Bay** on the basis that this designation should be extended along Glasaneely and Black Burn in Glenariff Bay. The objector stated that the justification for this related to these burns having roadside access which could open up opportunities for future development along these scenic and wildlife corridors.

The objector failed to provide accurate details, maps and persuasive justification for the inclusion of additional land in this LLPA. In the absence of more detailed information we are not in position to recommend the inclusion of this land within the LLPA.

## 5.9 SMALL SETTLEMENTS

- 5.9.1 The draft plan designates 7 new small settlements in the Moyle District (Designation SET 1) 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.

### CHURCH BAY, RATHLIN

- 5.9.2 Objection 334 queried the extent of **CBL 01 Church Bay** LLPA designation but no evidence was presented to substantiate this objection or to explain how the LLPA should be altered.
- 5.9.3 Objections 334 and 4986 to the Church Bay Site of Local Nature Conservation (SLNCI) (Designation MSLN21) were not substantiated with any further arguments. However, the Department has stated that they now wish to withdraw this designation from the plan, as this area already falls within the Church Bay Area of Special Scientific Interest (confirmed 24/09/2010).
- 5.9.4 Objection sites 334 on land to the **north west of St Thomas's Church and land to the north of Manor House** comprises a steeply rising bank covered by sprawling mature vegetation. Physically the steep gradient of the bank provides a definitive edge to the north west of the settlement. The inclusion of these sites within the SDL for Church Bay, would result in development on the face of the bank which would dominate the existing bay side development within the proposed limits for Church Bay. The bank and its vegetation cover provide an important back drop to the settling of the settlement at this location. Any development on these sites would be extremely visible on approach to the island. Given the physical and visual constraints of this land it should not be included within the SDL for Church Bay.
- 5.9.5 Objections 4637 and 4893 relates to the inclusion of land **north and south of Glebe Cottages, Bayview Road**. Bayview Road, runs along a ridge to the north and east edge of the proposed SDL. The road at this location is elevated above the majority of the settlement, especially to the north of Glebe Cottages, and then falls with the topography to the south of Glebe Cottages. To the north east side of Bayview Road the proposed SDL has been drawn only to include the development at Glebe Cottages. To the north the topography is elevated. The two semi detached dwellings that are not within the SDL are visible in the backdrop of Church Bay. Further development in this elevated area would result in stacked development rising up from the level of the bay. Such development would have a significant visual impact on the scale and character of Church Bay, especially when viewed on approach to the settlement via the ferry and from the harbour area. Standing stones are also visually evident in the southern part of this area. These stones have been noted as a scheduled Archaeological Site and Monument; as such they would present constraints to the development of this area. To the south of Glebe Cottages the topography is low lying and any further development in this area could be designed to be in keeping with the scale of the surrounding development within the proposed

SDL. However, given the existence of other vacant land within the proposed SDL, there is no need to breach the proposed edge of the SDL along the east side of Bayview Road any further.

- 5.9.6 Planning permission (E/2011/0162/F) has been granted on objection site 4901 to the **rear of Rathlin Community Development Association building** for 10 two storey social and affordable houses. These dwellings are under construction (Sept 2012). This land is already within the proposed SDL.
- 5.9.7 Objection site 4986 takes in relatively flat land to the south of the proposed SDL in **Church Bay**. While bounded by a 1 m high stone wall the land is open and highly visible when viewed across the bay from the north part of the settlement. The land is also adjacent to a scheduled archaeological monument. Given that the site is just over 2 ha in size, could yield some 20 – 40 units. Such a scale of development would have a significant visual impact on the setting and built form of Church Bay. Development of this scale would not be in keeping with the character of the settlement. We do not support this objection.
- 5.9.8 Objection 5732 requests that Rathlin Island is given special recognition as an Area of Special Character. Rathlin Island is already afforded protection by means of existing policies relating to the Antrim Coast and Glens AONB and proposed draft plan policies. We see no need for an additional layer of protection.

### **Recommendations**

- 5.9.9 **We recommend that:**
- **Church Bay SLNCI (MSLN 21) is withdrawn from the plan.**

### **CROMAGHS**

- 5.9.10 Objection site 334 is located to the **south of St Olcan's RC Church and Presbytery**. While it is on flat land, its inclusion within the SDL would be inappropriate because of its large scale and size. Development on this scale would not be in keeping with the rural character of the settlement and its position within the settlement hierarchy of the plan.
- 5.9.11 Objection 334, located **opposite Tureagh Terrace**, relates to flat open land with poorly defined site boundaries. Given the scale and size of the site its inclusion within the SDL would be inappropriate and would not be in keeping with the small scale rural character of this settlement.
- 5.9.12 Objection site 334 located **opposite and north of St Olcan's RC Church** relates to open exposed land that lack mature boundaries. The size and scale of this site if developed would double the size of Cromaghs. Its inclusion within the SDL would therefore be inappropriate as it would not be compatible with the character of the settlement.

- 5.9.13 Objection sites 334, 4376, 4377 and 4986, 5673 located on land **north/opposite the Gaelic Football Grounds** are located on flat low lying land. The majority of this land is within the Well Water flood plain. There are also archaeological constraints to the development of this land. Its inclusion within the SDL would be inappropriate because of its size and scale. Development on this land would not be in keeping with the character of this small settlement. The needs of St Olcan's Parish for the land adjacent to the church do not justify the expansion of the SDL to include this site.
- 5.9.14 Objection site 334 is located to the **west side of Tureagh Terrace**. The northern part of this land is within the Well Water flood plain. Objection 5618 also overlaps on this land and the neighbouring land opposite the Gaelic Football grounds. We are not persuaded that there is any need or justification to include any of these lands within the SDL..
- 5.9.15 Objection site 334, 5728 located to the **east side of Turreagh Terrace**, relates to two large fields, one which is occupied by a single dwelling. The inclusion of this land would result in linear sprawl spreading eastwards along Glenshesk Road and away from the main built form of the settlement. It would be inappropriate to include this land within the SDL.

## CUSHENDUN

- 5.9.16 Objections 334 and 4986 queried the extent of **CNL 01 Cushendun Coastal LLPA, CNL 02 Milltown Burn LLPA and CNL 01 Glendun River LLPA** but no evidence was presented to verify these objections or to explain how the LLPA's should be altered to overcome any concerns. We cannot give further consideration or support to these objections.
- 5.9.17 Objection site 334 relates to land **north and north east of Shanes Park**. Objection site 4986 relates north east portion of this site. The land is relatively flat wrapping around Shanes Park. Church Road runs along the sites northern boundary. A small church set within a wooded area is also to the northern boundary. All of the land is within the Cushendun Conservation Area, but outside any of the proposed LLPA's. Development on either objection site 334 or the smaller area of objection site 4986 would significantly expand this small settlement. Development of this land would threaten the natural setting of Cushendun and be out of scale with its character .
- 5.9.18 Objection site 334 to the **east side of Bay Road**, is a narrow strip of land that runs between the road and Cushendun beach. Development on this land would threaten views out of and into Cushendun. It would be totally inappropriate to include this land within the SDL.
- 5.9.19 Objection site 334 to the **east side of Cushendun Bridge Glendun River**, includes the width of the river and its floodplain. The river is not a suitable area for developing houses. The inclusion of this land within the SDL is therefore inappropriate.

- 5.9.20 Objection site 334 to the **south of Riverview Crescent**, relates to land adjacent to the Glendun River corridor and falls within the proposed LLPA CNL03 Glendun River. Development on this site would significantly detract from the setting of the settlement, particularly as seen when approaching it from Knocknacarry. Riverside Crescent provides a defined physical edge to the settlement at this location. Furthermore the size and scale of this site, if developed, would significantly expand this small settlement. Development of this scale would threaten the setting and character of Cushendun.
- 5.9.21 Objection site 334 along **Cave Road**, is located on steep rising land towards the south of the settlement. Cave Road is a narrow concrete Road. This land provides an important backdrop to the existing development within the settlement. The inclusion of this land within the SDL would be inappropriate as it would result in a visually prominent expansion to the settlement.

### **GLENARIFF (BAY)**

- 5.9.22 Objections 334 and 4563, 4986 queried the extent of **WTL 03 Glenariff Bay** LLPA in respect of Glenariff (Bay), but no further evidence was presented to substantiate these objections or explain how the LLPA's should be altered to overcome any concerns. Existing rural and AONB policies already afford protection from unacceptable development along Glasaneely Burn and Black Burn.
- 5.9.23 Objection site 334, located **north west of the Gaelic Football Grounds along Garron Road**, is a flat area of road side land. The football grounds provide a soft visual edge to the settlement when travelling along Garron Road. The inclusion of this land would be inappropriate given its scale and its proximity to the boundary of Waterfoot. This portion of land provides an important physical and visual break between the respective settlements.
- 5.9.24 Objection site 334 located **north and west of the Gaelic Football Grounds**, is three large flat fields with poorly defined boundaries. Access is restricted to this area of land. In any event, the inclusion of this land within the SDL would be inappropriate, as further development would impact on the setting of Glenariff (Bay) and would contribute to the merger of Waterfoot with Glenariff (Bay)..
- 5.9.25 Objection site 334 located **east on the side of the Gaelic Football Grounds**, is a flat road side field. The inclusion of development on this portion of land would bring development in Glenariff (Bay) closer to Waterfoot. Whilst the site follows the boundary of the SDL around the football grounds, development on this land would give rise to the appearance of urban sprawl along the road side.
- 5.9.26 Objection site 334 located to the **rear of St Patrick's and St Brigid's RC Church**, is located on steep rising land, which is covered by mature vegetation, hence its inclusion within the proposed LLPA WTL 03 Glenariff Bay LLPA. Garron Road is narrow at this location and access to the objection land is restricted by the existing and established development fronting the road frontage. This land provides a very important visual backdrop to this part

of the settlement, as viewed looking southwards across the bay. Its inclusion within the SDL would be inappropriate as development on it would be visually prominent.

- 5.9.27 Objection site 334 to the **south west of Garron Road**, comprises steep rising land. Its inclusion within the SDL would be inappropriate because of its scale and visually prominent location. This objection site also includes objection site 5528, whilst this is a smaller site, development even on this site would be visually prominent.
- 5.9.28 Objection site 334 **south east of Glen Road** is a flat portion of roadside land bounded to the south west by an agricultural lane. A mature 3-4 metre high roadside hedge restricts views of the land from Glen Road. On the opposite side and along the north east side of the Glen Road are a mix of semi-detached and detached dwellings. A footpath already runs along the road side boundary of the site. The inclusion of this site would be visually prominent from the Garron Road, given the lack of vegetation to the rear part of the site. The mature vegetation along the road side boundary assist with the filtering views of the existing development along Glen Road. Given the size and location of this land, its inclusion within the SDL would not be in keeping with the character of Glenariff (Bay).
- 5.9.29 Objection sites 334 and 4986 to the **west side of Garron Road and south east of Glen Road**, comprises two flat road side fields. Whilst the inclusion of this land lies into existing development within the SDL, its size if developed would substantially increase the scale and size of this small settlement. Its inclusion would be inappropriate because of its scale and size and the impact it would have on the character of this settlement.
- 5.9.30 Objection 4617 also relates to land to the **west side of Garron Road** and to the south east side of Glen Road. This objection site is inclusive of objection sites at 334 and 4986. The objector seeks the de-zoning of housing land in Waterfoot to be replaced within Glenariff (Bay). Housing land has not been zoned in any of the small settlements. We are not persuaded there is a need to expand the SDL in Glenariff for any purpose. The inclusion of this land would serve to disproportionately increase the scale and size of this small settlement. Accordingly this objection is not sustained.
- 5.9.31 Objection site 4526 to **north west side of Glen Road**, is a small site, set back from the road and accessed via the River Walk path. The River Walk path is a narrow land defined by a hedgerow and fence to each side. This path provides a defined boundary to this side of the settlement. Even though this is a small site and the objector is only seeking one dwelling, its inclusion would breach the existing physical edge of the proposed SDL and would result in an illogical protrusion at this location of the settlement.
- 5.9.32 Objection 4745 relates to a small rectangular site on **land adjacent to 19b Glen Road**. The land is located to the northern side of the River Walk. The land falls within Designation WTL 02 Glenariff River LLPA. Access to this land could be difficult, but not insurmountable. While development of this land would lie into the settlement form we are not persuaded that there is any need or justification for extending the SDL. We do not support this objection.

## **KNOCKNACARRY**

- 5.9.33 Planning permission has been granted (E/2007/0211/F) for housing on the small objection site 294, 334, 4986 and 5704 on land to the **east of Layde Road**. The Department accepts that this land should be included within the SDL for Knocknacarry. This development is only partially built. We support the inclusion of this land within the SDL.
- 5.9.34 Objections 334 and 5704 queried the extent of **KYL 01 Glendun River** LLPA but no further evidence was presented to substantiate these objections or to explain how the LLPA should be altered to overcome any concerns. The Department confirmed that a map of suitable scale, showing the extent of this LLPA, will be included in the final plan.
- 5.9.35 Objection site 334 & 5186, located on land **south of Glenview Park along Knocknacarry Avenue**, is an open area of land between the settlement and the small group of houses at Glenview Park. The western portion of this site is within the flood plain of the Glenview River. Development on this land would substantially increase the scale of the settlement and would merge the existing built form in this area, resulting in substantial urban sprawl out of character with the scale of the settlement along Knocknacarry Avenue. The inclusion of this land would be inappropriate because of its scale, size and location in relation to the existing urban form.
- 5.9.36 Objection site 334 & 5618 is located on **land opposite Agolagh Heights along Knocknacarry Road**. Objection site 5618 relates to a smaller portion of land than objection site 334. The site land is adjacent to the main road to Cushendun. Its western boundary is defined by mature tall 6-7 metres trees, which provide a solid edge to the existing settlement along the rear boundary of Knocknacarry Court. Development on this land would substantially increase the scale of the settlement and would result in further build up towards the east side of the settlement, in the direction of Cushendun. The inclusion of either objection site 334 or 5618 would be inappropriate because of its scale, size and location in relation to the existing urban form.
- 5.9.37 Objection site 334, located opposite **91, 93, 95 Knocknacarry Road**, involves low lying land. Over half the site is within the Glendun River flood plain. The inclusion of this site would result in further urban sprawl to the west side of the settlement. Development on this land would significantly detract from views towards the Glendun River, which is important to the setting of this settlement.
- 5.9.38 A small group of houses at **Glenview Park and Knocknacarry Crescent** are separated from the main settlement along Knocknacarry Avenue. In order to maintain a more compact urban form the Department stated that they wished to include this group of houses within the SDL for Knocknacarry. This addresses the concern raised by objection 5704. We endorse this suggested amendment to the plan.
- 5.9.39 Objection sites 334 & 5704 located on **land south west of Agolagh Heights** relates to gently rising land. Its inclusion within the SDL would further expand the recently partially constructed housing development. This would give rise to

further urban sprawl along the southern ridge to the settlement and should not be catered for.

- 5.9.40 Objection site 334, located on **land to the rear of Agolagh Heights**, is elevated above the neighbouring development. The site is adjacent to a partially constructed housing development to the west. The inclusion of this land within the SDL would be inappropriate given its scale and size. If developed it would excessively increase the size of the settlement beyond the character of a small settlement.
- 5.9.41 Objection site 334, located **east of Agolagh Heights**, relates to gently rising land. The inclusion of this land would be inappropriate as it would result in excessive urban sprawl heading towards Cushendun.
- 5.9.42 Objection site 4575, located on the **west side of Knocknacarry Avenue**, is a small site on relatively flat land immediately north of the Parochial House. Notwithstanding the small scale of the site, its inclusion within the SDL would give rise to further urban sprawl in the direction of Glenview Park. The inclusion of this site would not constitute rounding off.
- 5.9.43 Objection site 4575 to the **east of Layde Road**, relates to rising land. Whilst the site is small in scale, its inclusion would further extend the appearance of urban sprawl along Layde Road, as it would physically link the dwelling at 135 Layde Road to the settlement.

### **Recommendations**

- 5.9.44 **We recommend:**
- **The inclusion of land east of Layde Road to take account of Planning Permission E/2007/0211/F.**
  - **Provision of a full scale map within the plan to illustrate the extent of the KYL01 Glendun River LLPA.**
  - **A Settlement Development Limit should be drawn around the existing grouping of houses at Glenview Park and Knocknacarry Crescent**

### **LISCOLMAN**

- 5.9.45 Objection 334 queried the extent of **LNL 01 Liscolman Mill** LLPA, but no further evidence was presented to substantiate this objection or to explain how the LLPA should be altered to overcome any concerns.
- 5.9.46 Objection site 334, located to the **south west of the junction of Coleman Avenue and Toberdoney Road**, relates to a large flat site. The roads at this location provide a physical barrier to the edge of the settlement at this location. The inclusion of such a large scale portion of land at this location would breach the edge of the existing settlement, resulting in excessive urban sprawl at this location.

- 5.9.47 Objection site 334, to the **south east side of Toberdoney Road**, relates to a large portion of land within the proposed LLPA LNL 01 Liscolman Mill. The floodplain runs through the centre of the site. It is also an important site in terms of the setting of the settlement and the Mill. The inclusion of this land within the SDL would be inappropriate as it would give rise to a substantial expansion to the settlement that would threaten the character and setting of the settlement.
- 5.9.48 Objections sites 334 and 5618 involve land to the **west of 1-12 Toberdoney Road, and north of Colman Avenue**. These objection sites partially overlap but relate to the expansion of the settlement in the same area. Both objection sites represent a significant expansion to the west side of the settlement, which would result in substantial urban sprawl at this location. Such expansion would be inappropriate for a settlement of this size.
- 5.9.49 Objection sites 334 and 4986 located to the **west side of Carnbore Road** is a large flat field adjacent to a playing field. The inclusion of this land would be inappropriate due to its scale and would give rise to a substantial expansion beyond the character of this small settlement.
- 5.9.50 Objection site 334 located to the **rear of 30 Colman Avenue** is a large agricultural field that wraps around the existing road side development. The existing development at this location provides a soft rural edge to the settlement. The inclusion of this site within the SDL would be inappropriate as it would significantly expand the settlement at this location, resulting in further urban sprawl.
- 5.9.51 The inclusion of objection site 5618, located to **the north of Orby Drive and west of Carnbore Road**, would not be appropriate given its scale and size. Development of this land would give rise to a substantial expansion almost doubling the size of the settlement.

## LISNAGUNOGUE

- 5.9.52 Objection 334 queried the extent of the proposed Area of Archaeological Potential, but provided no further evidence to substantiate this objection.
- 5.9.53 Objections 334 and 4986 relate to a large portion of land to the north of the settlement on **land to west side of Park Road**. Objection site 4986 relates to a larger portion of land that overlaps objection 334. The land is slightly elevated and visible from Whitepark Road. The inclusion of either site within the SDL would almost double the size of the settlement. This would present a significant threat to the character and setting of the settlement. It would also impact on the setting of Dunseverick Church and the distinctive setting of the World Heritage Site.
- 5.9.54 The inclusion of objection site 334 to land **east and south of Dunseverick Church**, would be inappropriate as it would result in further expansion to the SDL resulting in unnecessary urban sprawl to the east of the settlement.

- 5.9.55 Objection sites 334 and 5738 relate to **land south of Whitepark Road**, which is a large flat agricultural field to the south of the settlement. The inclusion of this land would be inappropriate because of its scale and size, which would substantially and unacceptably alter the scale of this small settlement.
- 5.9.56 Objection sites 334 and 5618 relate to land south of **249 and 258 Whitepark Road**. Objection site 5618 only relates to the eastern side of the 334 objection site. The inclusion of either objection sites would be inappropriate as they would result in further expansion into the countryside and into the distinctive setting of the World Heritage Site.
- 5.9.57 Objection site 4743 relates to a small site at **226 Whitepark Road**. The SDL as drawn at this location does not follow any natural physical boundaries and cuts through the yard to the rear of 226 Whitepark Road. The inclusion of this property and its curtilage would result in a logical rounding off of the settlement at this location. This would not harm the setting of the settlement or any of the relevant environmental constraints in this area.
- 5.9.58 The inclusion of objection site 334, to the **north of Burn Brae**, would result in a significant expansion to the north of Lisnagunogue. The inclusion of this site within the SDL would breach the open space buffer to the edge of settlement, giving rise to the appearance of urban sprawl into the surrounding countryside..

### **Recommendations**

- 5.9.59 **We recommend:**
- **The inclusion of objection site 4743 at 226 Whitepark Road within the proposed SDL for Lisnagunogue.**

## 5.10 COUNTRYSIDE AND COAST

5.10.1 Section 1.14 of our report sets out the strategic context for the countryside throughout the plan area, including Moyle. The main issues raised by the objections to countryside and coast include:

- a) Land in the countryside should be identified as a hamlet, for tourism or as an LLPA;
- b) Designation of Sites of Local Nature Conservation Importance (SLNCI);
- c) Designation of Areas of Constraint on Mineral Development;

### **Land in the countryside that should be identified as a Hamlet, for Tourism or as an LLPA.**

5.10.2 Objection 4954 seeks that **The Aird** is designated as a small settlement and that additional land along the Causeway Road is included within the settlement. The designation of the Aird as a small settlement was considered in paragraph 1.3.42 of the our report on the plan strategy wherein we concluded that the area should not be designated as a small settlement. The arguments and evidence presented at site specific stage do not persuade us that a different conclusion should be reached in respect of the non-designation of The Aird as a small settlement in the plan area.

5.10.3 Several objection sought the designation of **Castlecatt**, which is situated SE of Bushmills, and **The Castle**, off Harbour Road, Ballintoy to be recognised as small settlements. These areas were considered in paragraph 1.3.43 and 1.3.44 of the strategy wherein we concluded that both areas should not be designated as small settlements in the plan.

5.10.4 Objection 4773 seeks the support of the plan for **Bushmills Golf Resort** and objects to how the plan blights tourism and economic stability. The objector failed to provide evidence as to plan should be amended. Nonetheless, issues around a site specific development proposal are not a matter for the plan. Since the publication of the plan the Department has issued PPS 16 Tourism which sets out policy for all types of tourism development. Accordingly we are satisfied that the plan requires no amendment on the basis of this objection.

5.10.5 Objection 4971 seeks that land adjacent to **Causeway Road** is designated as a tourism development opportunity site. With exception to the proximity of the site to the WHS at the Giants Causeway and the coastline, the objector provided no persuasive evidence to demonstrate what was so significant about this site that it should be specifically designated for tourism in the plan. PPS16 Tourism has been published and sets out regional policy to address tourist development proposals. Accordingly the objection is not sustained.

5.10.6 Objection 5186 seeks that land along the **Causeway Road south and south west of the Giants Causeway visitor centre** is designated as a tourism opportunity site. The WHS visitors centre is now developed and operational. The objector provided no persuasive evidence to demonstrate a need to designate this land as a tourism opportunity site. PPS 16 Tourism has been published and sets out regional policy to address tourist development proposals. Accordingly the objection is not sustained.

- 5.10.7 Objection 5728 seeks that **Glenshesk Valley** is designated a DRC within the plan area. This objection was addressed within Policy SET 1 of our strategic report, wherein we concluded that the general absence of a traditional focal point and of other community facilities and services did not merit a DRC at this location. No persuasive site specific evidence was provided to change our view on this matter.
- 5.10.8 Objection 5733 is to the failure of the plan to recognise the Scheduled Archaeological Site at **Ossians Grave** as a tourism potential site in the Glenaan, Cushendall and Antrim Coast & Glens Area. The importance of this site has already been recognised through its designation as a scheduled monument. If the objector wishes to develop the infrastructure around this scheduled monument this is a matter to be accessed via a planning application, under the appropriate regional policy set out in PPS16 Tourism. We are not persuaded that there is a need to designate this site for tourism in the plan.
- 5.10.9 Objection 4668 seeks that the area surrounding **Ballintoy Harbour** should be designated a 'super' LLPA. This is an attractive and environmental sensitive area and forms an important part of the coastal area which the plan already recognises as being important. Regional Policy contained in PPS6 does not have a definition for a 'super' LLPA. The objector failed to provide any persuasive evidence to demonstrate why this area should be designated as an LLPA and how such a designation would serve to give further protection to this area.

#### **Designation of Site of Local Nature Conservation Importance (SCLNI)**

- 5.10.10 Objection 331 made a generic objection to **Designations MSLNCI 01 – MSLNC 77**. These objections were not substantiated with evidence to justify what changes should be made to the designation and in the absence of such information we cannot consider them further.
- 5.10.11 Objections 4563 requested clarification on two potential SLNCI's at **Ballykenver Forest (D180360) and Clare Wood (D070410)** on why these sites were not included in the plan. The Department has identified SLNCI's for Moyle District through the advice set out in PPS 2. The objector provided limited information relating to these sites. In the absence of more detailed information, including suggested boundaries, we cannot consider the designation of these two sites further.
- 5.10.12 Objection 5618 is to the designation of **MSLNCI 18 Carey Valley** where it overlaps the village of Ballyvoy. The objector provided no evidence to justify their objection. The SLNCI covers a wide area, and the exclusion of Ballyvoy would compromise the overall designation. Accordingly the objection is not sustained
- 5.10.13 Objection 5728 is to the inclusion of land at Glenshesk Valley within **MSLNCI 38 Dunfinn SLCNI**. The objector provided no evidence to state why this land should not be included within this SLNCI designation.

## **Designation of Areas of Constraint on Mineral Development**

- 5.10.14 Objection 5644 argued that **Ballycastle Beach** should be identified as an area of constraint on mineral development to prevent the removal of sand and gravel deposits. We considered the issue of such extraction along North Coast beaches in our strategic report (p83-84), whereby the Department agreed to add additional text to paragraph 10.4.3 of the Strategic Framework Document.