Data Protection Officer Mid and East Antrim Borough Council The Braid 1-29 Bridge Street Ballymena BT43 5EJ

Section B. Your Details

Q1. Are you responding as individual, as an organisation or as an agent acting on behalf of individual, group or organisation? (Required)

Please only tick one

Individual (*Please fill in the remaining questions in the section, then proceed to Section F.*)

Greanisation (Please fill in the remaining questions in the section, then proceed to Section D.)

X Agent (Please fill in the remaining questions in the section, then proceed to Section E.)

Q2. What is your name?

Title

First Name (Required)

Last Name (Required)

Email

Q3. Did you respond to the previous Preferred Options Paper?

Unsure

Yes

Г

Section C. Individuals

Address Line 1 (**Required**)

Line 2

Line 3

Town (Required)

Postcode (Required)

Section D. Organisation

If you have selected that you are responding as an organisation, there are a number of details that we are legally required to obtain from you.

If you are responding on behalf of a group or organisation, please complete this section, then proceed to Section F.

Organisation / Group Name (Required)

Your Job Title / Position (Required)

Organisation / Group Address (if different from above) Address Line 1 **(Required)**

Line 2

Line 3

Town (Required)

Postcode (Required)

Section E. Agents

If you have selected that you are responding on behalf of another individual, organisation or group there are a number of details that we are legally required to obtain from you.

Please provide details of the individual, organisation or group that you are representing.

Client Contact Details

Title

First Name (Required)

Last Name (Required)

Address Line 1 (Required)

Line 2

Line 3

Town (Required)

Postcode (Required)

Q4. Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP?

Please only select one.

	Agent		Client		Both
--	-------	--	--------	--	------

Section F. Soundness

The draft Plan Strategy will be examined at Independent Examination in regard to its soundness. Accordingly, your responses should be based on soundness and directed at specific strategic policies or proposals that you consider to be unsound, along with your reasons. The tests of soundness are set out below in Section M.

Those wishing to make representations seeking to change the draft Plan Strategy should clearly state why they consider the document to be **unsound** having regard to the **soundness tests** in Section M. It is very important that when you are submitting your representation that your response reflects the most appropriate soundness test(s) which you believe the draft Plan Strategy fails to meet. There will be no further opportunity to submit information once the consultation period has closed unless the Independent Examiner requests it.

Those who make a representation seeking to change the draft Plan Strategy should also state whether they wish to be heard orally.

Section J. Type of Procedure

Q5. Please indicate if you would like your representation to be dealt with by: (Required)

Please select one item only

Written (Choose this procedure to have your representation considered in written form only)

Oral Hearing (Choose this procedure to present your representation orally at the public hearing)

Unless you specifically request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Section K. Is the draft Plan Strategy Sound?

Your comments should be set out in full. This will assist the Independent Examiner understand the issues you raise. You will only be able to submit further additional information if the Independent Examiner invites you to do so.

Sound

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If you consider the Plan Strategy to be Sound and wish to support the Plan Strategy, please set out your comments below.

(Required)

Section L. Unsound

In this section we will be asking you to specify which part(s) of the draft Plan Strategy you consider to be unsound.

Note: If you wish to inform us that more than one part of the draft Plan Strategy is unsound each part should be listed separately. Complete this page in relation to one part of the draft Plan Strategy only.

Q6. If you consider that the draft Plan Strategy is unsound and does not meet one or more of the tests of soundness below, you must indicate which test(s) you consider it does not meet, having regard to Development Plan Practice Note 6 available at:

https://www.planningni.gov.uk/index/news/dfi planning news/news releases 2015 onwards/development plan practice note 06 soundness version 2 may 2017 .pdf

Please note if you do not identify a test(s) your comments may not be considered by the Independent Examiner.

Continued on next page.

Section M. Tests of Soundness (Required)

Procedural tests

- P1. Has the plan been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
- P2. Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- P3. Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?
- P4. Did the Council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?

Consistency tests

- C1. Did the Council take account of the Regional Development Strategy?
- C2. Did the Council take account of its Community Plan?
- C3. Did the Council take account of policy and guidance issued by the Department?

Coherence and effectiveness tests

- CE1. The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans of neighbouring Councils.
- CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
- CE3. There are clear mechanisms for implementation and monitoring.
- CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.

Section N. Which part(s) of the draft Plan Strategy are you commenting on?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to inform us that you consider more than one part of the draft Plan Strategy is unsound, you can submit further representations by completing and submitting additional copies of this section.

Relevant Policy number(s)

(and/or)

Relevant Paragraph number(s)

(and/or) District Proposals Map

Please give full details of why you consider the draft Plan Strategy to be unsound having regard to the tests(s) you have identified above. Please be as clear and concise as possible.

If you consider the draft Plan Strategy to be unsound, please provide details of what changes(s) you consider necessary to make the draft Plan Strategy sound.





Mid and East Antrim Borough Council Local Development Plan

Response to Local Development Plan Strategy



Pragma Planning & Development Consultants Ltd. Scottish Provident Building 7 Donegall Square West Belfast, BT1 6JH

December 2019

'Regulated by RICS'

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Response to Local Development Plan Strategy

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Introduction 1

1.1 Scope and Purpose of the Paper

This response paper has been prepared by Pragma Planning and Development Consultants Limited in association with Carnlough Developments, Emeritus Communications Ltd, Alan Patterson Design and McQuitty Landscape Design with the intended purpose of responding to the draft LDP Plan Strategy (dPS).

Pragma Planning has prepared a response to the dPS that identifies issues with the policy framework and approach to housing allocation that affects the soundness of the dPS. This response provides a rationale addressing a number of those issues. It proposes the development of currently undeveloped land in north Larne as housing and open space including a community greenway and describes how this can be achieved through a balanced housing provision exercise and delivered by private investment. The proposals have come about as a result of discussions with the Council.

The paper therefore examines the intended aims and objectives of both the Community Plan and the LDP POP, sets out the strategic advantages of Larne as a main settlement within the plan hierarchy and its growth potential in respect to the both its strategic assets and housing provision.

It also takes account of consultation reports commissioned by the Council to support the delivery of the Community Plan and the POP, paying particular attention to the advice on working with developers to play a role in enhancing the lived experience of the population.

On that basis the paper also assesses the potential for the north Larne area to deliver development that meets a range of the objectives of both the POP and the Community Plan and sets out a mechanism for achieving this, based on the experience of this practice in other local authority areas.

Finally the paper sets out potential strategic policies for consideration by the Council; these are based on the practice's detailed knowledge of policy preparation gained through its work with the Royal Town Planning Institute's Policy Practice and Research Committee.

How the Paper is Structured 1.2

The paper seeks to provide information as clearly as possible, it is divided into the following sections: -

- Section 1 provides the introduction and scope of the report
- Section 2 sets out the historic background to the paper and this current process and addresses the strategic value of Larne from the plan making perspective
- Section 3 provides the planning framework including the Community Plan and the LDP POP
- Section 4 defines the extent of the study area related to the report
- Section 5 details the landscape and visual issues associated with development in North Larne

- Section 6 identifies the strategic long term advantages of Larne
- Section 7 sets out a series of potential strategic policies for consideration
- Section 8 describes a potential Master Plan for North Larne
- Backaround 1.3

In 2016 Carnlough Developments sought planning permission for housing on land in north Larne that was outside the settlement limits of the town in the current statutory development plan. The application was refused.

Following on from the refusal, Carnlough Developments commissioned a new consultant design team to re-examine its position.

The design team appraised Carnlough Developments holding in north Larne in visual terms and analysed the topography and setting of the land to determine its development potential. It also examined the issues identified by the Council in the Community Plan and the POP within the established legal framework in which the emerging Local Development Plan is seen as the spatial outworking of the Community Plan.

In particular the analysis determined that the land had a primarily urban context and that there were parts of it in which development would not be visible. In that context the value of the Area of Outstanding Natural Beauty would not be compromised through sensitive landscape led development. In addition, the analysis showed that the area to the south of Carnlough Developments' holding, which is zoned in the current development plan is both higher and more prominent and its development would create more harm to the AONB than a sensitive scheme on the Carnlough Developments' land. This proposal involved the provision of public open space across a substantial portion of the land.

An initial meeting was held with the Council on 10 May 2018 following which further analysis and visioning was carried out.

A proposal emerged in which the whole of the undeveloped lands were considered as a single unit that included the zoned housing land owned by NIHE, open space land to the south of it also owned by NIHE and the land to the north owned by Carnlough Developments. A balanced approach was taken to the overall numbers of dwellings to be delivered based on the necessity for the housing land to provide public open space and the inevitable displacement of dwelling numbers as a result. From the analysis the location of the open space on the headland was a logical conclusion that served the wider landscape interest and it then became clear that a linear park could be created extending from Drains Bay to the Caterpillar factory. Further analysis and a review of the Connswater Community Greenway showed that it would be possible to create a greenway through this new park and with agreement through the Caterpillar factory to the Coast Road at the Chaine Memorial Park.

This paper contains that analysis.

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Response to Local Development Plan Strategy

A proposed Master Plan for the development of the area was worked up, a full copy is in section 8 while a smaller copy is on the right of this page. Through a further series of meetings involving the local MP, the NIHE, Caterpillar, Council officers and members was subject to discussion about its delivery. Arising from those meetings the Council requested that the proposal be written up as a submission to the Local Development Plan team.

1.4 Terms used in the Paper

In the paper a number of terms are used that describe elements of the land included in the development proposals and its surrounding context, these are defined as follows: -

- North Larne is the area of Larne north of the town centre, extending out to Drains Bay and centred on the Old Glenarm Road;
- The undeveloped lands are all the lands in north Larne located between Drains Bay and the Caterpillar factory, they are in the ownership of Carnlough Developments and the NIHE, it is sometimes also referred to as the development area;
- The northern part/area of the undeveloped lands is in the ownership of Carnlough Developments;
- The northern edge is the northern boundary of the northern part of the undeveloped lands;
- The southern part/area of the undeveloped lands is in the ownership of NIHE;
- The Woods is the area of housing located between the northern part of the undeveloped lands and the Old Glenarm Road, it was constructed by Carnlough Developments;
- The urban area of Larne refers to the developed area that surrounds the undeveloped lands on southern, western and northern sides, it includes Drains Bay, the development fronting the Coast Road and the developed suburbs of Larne to the south and west, it is also referred to as the urban context of the undeveloped lands;
- The developers refers to the owners of the undeveloped lands, which have development potential, in particular, Carnlough Developments and NIHE or any other entity acquiring the NIHE land; and
- The AONB is the Area of Outstanding Natural Beauty originally designated in the 1960s and subsequently re-designated in the 1980s, its boundary crosses the undeveloped lands and includes parts of the urban area

The Development Master Plan



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Response to Local Development Plan Strategy

2. Context

The history of planned development in North Larne stems from the East Antrim Area Plan of 1976, it includes zoned land for development from the FJ Wilson (now Caterpillar) factory north towards Ballygalley. The plan map, below, shows how these zonings overlapped with the Area of Outstanding Natural Beauty.

East Antrim Area Plan Map Extract



The plan indicates at paragraph 3.8 that this area could accommodate nearly 700 dwellings, planning permission had been granted for a large proportion of the area identified on the map above as 3.8 and confirms that part of the area was under construction at the time the plan was published in 1977.

The Old Glenarm Road functioned as the district distributor road concentrating traffic in the area and directing it into the town centre. Development along this arterial route was sporadic as planning policy did not seek overall master plans until the Quality Initiative in 1996. Nonetheless, housing, schools and commercial developments took place. As shown on the image below from 2001.

Google Earth Image from 2001



The Larne Area Plan published in 1998 continued the broader policy of development along the Old Glenarm Road but inexplicably de-zoned land beneath the headland at the Black Arch while retaining the more visible higher land above it. As shown on the plan map overleaf.

The plan zoned the area of lower lying land, which is owned by Carnlough Developments, as passive open space with no firm proposal for its long-term development or management.



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Response to Local Development Plan Strategy

Larne Area Plan Map Extract



The land at the Woods off the Old Glenarm Road had been developed by Carnlough Developments in piecemeal fashion in accordance with the policy at the time, a series of planning applications were submitted and houses constructed with access roads left ready for future development of the adjoining lands.

During the period of the East Antrim Area Plan applications on the land were made between 1978 as referred to in the Plan and 1989 to 1993. Consequently it is possible that planning permission exists across the land owned by Carnlough Developments. The applications are set out in the table opposite.

The Regional Development Strategy, "Shaping our Future" was accompanied by "The Family of Settlements" report. This report set out the positive strategic advantages of each of the main towns in Northern Ireland. The RDS and Family of Settlements regarded Larne as a town of considerable strategic importance, it was firstly one of a limited number of regional gateways, it was a hub on the regional transport network and it was a main town.

Application Reference	Description	Status
F/93/0083	Housing Development	Approved
F/92/0310	Housing Development	Approved
F/89/0372	Access Road	Approved
F/195/78	Housing Development	Approved

The current situation in Larne is largely unchanged, the town remains a major gateway into Northern Ireland, its deep water port remains a major passenger and freight terminal and entry/exit point and it retains its rail connection to Belfast. The town also remains an intra-NI gateway, to the Antrim Coast and Glens, the A2 Antrim Coast Road begins in Larne and runs for over 40km north to Cushendall, it has become the major tourist route in Northern Ireland over the past 10 years.

The RDS 2035 states: -

Table 1 – Planning History

"Larne is situated in a strategic coastal location with a natural harbour and is the second largest port in Northern Ireland. Its unique position provides strong linkages with south-west Scotland and its road and rail links form part of the Trans-European Networks (TENs) Route from Cork through Dublin and Belfast to Stranraer in Scotland. Larne's position on the Causeway Coastal Route has the potential to create a centre for tourism and with regeneration of the townscape to increase the vitality and prosperity of the town centre."

Of greatest significance, however, is the A8 which has been significantly upgraded by a dualling scheme opened in 2015, this road puts Larne within the travel to work area of Belfast and is leading to rapid increases in house building in the town that have not been foreseen to date.

Accordingly, Larne retains its status as a main town and major gateway to and within Northern Ireland and is strategically highly well located to drive and benefit from both tourism and port related business while establishing a higher order service function as a result of the enhanced A8 link.



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Planning Framework 3.

3.1 Introduction

The current planning framework is composed of: -

- 1. At the regional strategic level the Regional Development Strategy and the Strategic Planning Policy Statement; and
- 2. At the local district level the Community Plan

Each of these is set out in brief below.

The Regional Development Strategy 3.2

The RDS's Spatial Framework identifies Larne as a Main Hub that is part of a cluster with Ballymena and Antrim, and as one of four Gateways into Northern Ireland.

The Main Hubs are supported through the RDS aims that develop the Programme for Government priorities including supporting towns and villages to maximise their potential by: -

- Creating opportunities, tackling disadvantage and improving health and wellbeing;
- Building a strong and shared community; and
- Delivering high quality and efficient public services

The Hubs are placed to benefit from and add value to the regional economy with clusters driving greater critical mass. Within the Hubs compact urban form is delivered by "further integrating key land uses with transportation measures" and providing a "new emphasis on how to reduce dependence on the car and change travel behaviour".

RDS Diagram No 23 - Spatial Framework

[TO BE ADDED]

Regional Guidance sets out the main themes in delivering the strategy, RG2 promotes a balanced approach to transport infrastructure including improving access to town centres and other growth areas such as ports. RG3 seeks a sustainable approach to the provision of tourist infrastructure including the improvement of tourist facilities incorporating wider public benefits.

Under the theme of Society regional guidance seeks to strengthen community cohesion and support an urban renaissance (RG6 and RG7). In particular it recognises that the unique identities of places should be built upon and enhanced; this means clearly understanding the strategic benefits of a place and devising policies to promote its development and in particular the guidance recognises that there is an increased need to provide green infrastructure.

Links between existing elements of urban infrastructure play a vital role in securing sustainable places. The RTPI has indicated that this is because the amount of new construction year on year is very small compared to the existing stock of buildings and the true issues of interconnectivity relate to the existing stock.

RG8 seeks to manage housing growth to achieve sustainable patterns of residential development, this includes using new development to link existing developments together and promote sustainability; in particular it states: -

"Strategic planning places emphasis on the importance of the relationship between the location of housing, jobs, facilities and services and infrastructure." (paragraph 3.15)

This theme is carried forward into table 3.2, in particular it includes: -

- A transport test to determine the potential for integrating land use with public transport and walking and cycling routes to help reduce reliance on the private car; and
- A resource test to assess and detail the existence of community assets and physical infrastructure

These are elements of an evaluative framework intended to allow councils to pursue housing growth policies in accordance with the specific needs and characteristics of the places they represent. RG8 is also clear that the housing growth indicator figures are guidance only and are not a rigid framework, it goes on to state that due weight needs to be given to reinforcing the leading role of the Main Hubs.

The Strategic Planning Policy Statement 3.3

The SPPS also identifies Larne as one of the region's primary ports.

It applies a differentiation between developed and undeveloped coast; visually North Larne is part of the developed coast, development is present in all key views towards the town from the north across Ballygally bay and when passing through the Black Arch from the south. On the Old Glenarm Road the frontage is urbanised out as far as Branch Road.

The SPPS requires local development plans to bring forward a strategy for dealing with both developed and undeveloped coastal areas where they exist in Council area and to promote policies that protect and enhance areas of amenity value and public access.

In relation to housing the SPPS requires local development plans to provide policies and proposals tailored to the specific circumstances of the plan area. The overriding objectives include: -

- Increased housing density without town cramming
- Sustainable forms of development major housing development should be located in sustainable locations that facilitate a high degree of integration with centres of employment, community services and public transport, and take advantage of existing infrastructure.

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Response to Local Development Plan Strategy

- Good design; and
- Balanced communities

The SPPS also requires Local Development Plans to contain a housing allocation policy that is informed by a series of tests that include: -

- Housing Growth Indicators guideline figures referred to in the RDS;
- The Housing Evaluation Framework RDS table 3.2 referred to above;
- Housing Needs Assessment/Housing Market Analysis;
- Transport Assessment; and
- A Sequential Test however, as indicated above the RTPI considers one of the most significant influences on the sustainability of a place to be the interconnectivity between its existing stock of buildings and uses. This places a different weight onto a simple sequential test that ought to be considered

However the key issue for Councils in bringing forward development plans is to ensure that as a minimum a 5 year supply of land for housing is maintained. Failure to adequately provide housing land at the plan stage is likely to result in uncontrolled land releases where the Council is unable to demonstrate that it has a 5 year supply.

Plans are therefore required to meet the full range of identified need across the plan period, build in a 5 year buffer and provide for a managed release of housing land in accordance with the 'plan monitor manage' approach.

The Community Plan 3.4

In line with the aims of the RDS and the objectives of the PfG, the Community Plan, Putting People First, identifies a number of themes, which include: -

- The good health and wellbeing strand, which includes the gap in play provision that is walkable in the northern part of Larne and the overall shortage of open space alongside the need to meet the demands of an ageing population in the borough and the opportunities for training in the support industries behind caring for the aging population (that fall into the education strand);
- The environment strand and in particular the need to provide access to good quality open space providing a range of uses, accessible by walking, that integrates into a coastal route. Also the value of Black Arch as a natural asset and its integration into a walking/tourism route encouraging people to stay longer in the area rather than passing through particularly with its links to the fossil beds in NI's Jurassic coast. Developing housing and open space together helps address the safer places strand

The LDP Preferred Options Paper 3.5

The LDP is intended to be the spatial outworking of the Community Plan. It has been published for comment from the public.

The POP is an opportunity for the Council to set out in broad terms its vision for the development and growth of the area; the Mid and East Antrim POP identifies a series of overarching principles, including: -

- No 2. Promoting Accessibility and Connectivity;
- No 3. Promoting Legibility and a Quality Public Realm;
- No 4. Promoting Community Health and Wellbeing;
- No 5. Promoting Inclusive Communities; and
- No 6. Protection and Enhancement of the Built and Natural Environment

It has been noted that the POP does not agree with the tourist vision of the Community Plan.

It has also been noted that the POP only refers to the housing growth indicator figures, which is contrary to the RDS. The HGI figures are guidelines only and LDPs are expected to deploy a range of measures to calculate the housing growth figures including taking account of major pieces of public investment and the growth potential of towns stemming from the growth of other industries including tourism.

3.6 Key Elements of the Study

Taking full account of the context and planning framework the study examines and assesses the potential of the North Larne area in terms of achieving the following outcomes that are in accordance with the Community Plan and RDS: -

- Integration between land use and transportation, improving accessibility and connectivity and in particular creating and strengthening the links between existing land uses to help promote a sustainable town:
- Promoting good health and wellbeing, which includes access to open spaces, meeting gaps in provision, utilising natural assets and developing their tourist potential;
- Creation of high quality, legible environments that integrate with tourism opportunities and manage existing natural and built environmental assets; and
- Providing for inclusive communities and in particular meeting the gaps in provision that have been identified while enabling opportunities

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Response to Local Development Plan Strategy

4. The Study Area

4.1 Definition

The area of study is set out below, we have confined the assessments to the north Larne area.

The study area is defined as the area of Larne, north of the town centre served by the Old Glenarm Road, distributor road, based on an approximate 500 metre radius walk-in area centred on the road.

Lane North study area



4.2 Land Use Mix

This part of Larne is formed from a series of neighbourhoods, mono-use interlaced together as shown on the land use map opposite.

Larne North – Existing Land Use Pattern



The southern part of the area is densely developed with a range of housing, employment and institutional land uses, as shown below.



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Southern Area Land Uses

The northern area is less intensively developed, it is much more fragmented with significant gaps between the development neighbourhoods, leading to a less than compact urban form, as shown below.

Northern Area Land Uses



4.3 Connectivity

The major connective route within the area is the Old Glenarm Road, which functions as a local distributor, each of the neighbourhoods connects on to it and it in turn links to the town centre, as shown below.

As such the Old Glenarm Road forms the spine road for Larne North and can only be seen as a local distributor road.



Response to Local Development Plan Strategy

Old Glenarm Road Distributor Road



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Response to Local Development Plan Strategy

4.4 Opportunities

The principle opportunity is to develop this area to create a compact urban form utilising the existing local distribution system and adapting the area to a more sustainable development form by adding an additional connection to facilitate walking and cycling.

At its farthest point the study area is 2.7km from the town centre on a direct north-south route. This is a substantially better situation than Larne West which is around 3.5km from the town centre on an indirect and circuitous route.

The current Larne Area Plan contains significant undeveloped zonings of open space and housing in this area; those are shown on the map below, although it is considered that as this is a new process it would be inappropriate to place significant weight upon them.

Larne Area Plan Zonings



These lands are undeveloped opportunities, they are shown on the map opposite.

Undeveloped Lands in North Larne



The undeveloped lands offer the principal opportunity to connect the area and develop a compact urban form well connected to the town centre.

In particular the undeveloped area in the north of the study area, which extends along its eastern edge, offers a significant opportunity to make a strategic connection from east to west across the area using the existing network of streets and spaces as illustrated below.

Foot and cycle travel becomes possible across the area using these connections while the undeveloped land can be utilised for a mix of housing and open space incorporating a greenway connection to Larne town centre using the existing Chaine Park.

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Response to Local Development Plan Strategy

Adapting the Area to Foot and Cycle Travel



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Response to Local Development Plan Strategy

4.5 Implementation

Many development plans, in particular the Ards and Down Area Plan and the Belfast Metropolitan Area Plan contain infrastructure proposals that are to be either delivered in their entirety or part delivered and funded in their entirety by developers and developer contributions governed through planning agreements.

The opportunity described above offers the potential for such a delivery mechanism provided for through the Local Development Plan.

This can be achieved in a balanced manner through an exchange of open space and residential land. While the overall balance remains to be agreed the extent of residential land would be linked to the amount of the contribution that is required to deliver the open space and community greenway.

The ultimate extent of the land required is a matter for debate at a later stage of the plan, the present process is concerned with the strategic policy that would be required to ensure delivery. Therefore there would be: -

- Policy to set out the concept of community greenways and open space funded by developer contributions including the means of managing and maintaining them; and
- Policy to ensure the delivery of the greenways in association with the housing through comprehensive planning and agreed phasing

The mechanism adopted in the Ards and Down Area Plan to secure the construction of developer funded sections of relief road around Newtownards is a relevant model, it has been tested by the Planning Appeals Commission and has not failed.

In this model the landowners and developers act comprehensively to design and develop the link roads through their lands, the plan stipulates where the roads must commence and firmly states that planning applications must deliver the whole of each section through each zoning; it permits housing and road development together and leaves the details of the phasing to be agreed at the planning application stage.

There is a further precedent for the zoning of housing and open space lands together and combined with major infrastructure delivery. Again, in the Ards and Down Area Plan proposals for Newtownards, the NS 19 housing zoning, the NS 43 open space zoning and the Bowtown Road to Movilla Road section of the Newtownards relief road are all incorporated into the one set of requirements and all are to be delivered by developers.

Section 7 details that a balanced approach can be taken to the allocation of housing numbers as part of the proposal to enable provision of the zonings without adversely affecting the overall housing growth allocation determined by the Council.





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Response to Local Development Plan Strategy

5. Landscape and Visual Issues

5.1 Introduction

In the context that a portion of the proposed revised zonings exists within the Area of Outstanding Natural Beauty a Landscape and Visual Impact Assessment (LVIA) was prepared to better understand the potential extent of effects arising from re-zoning the land. In particular there is an extant relationship between the NIHE lands already zoned in the Larne Area Plan and a visual effect on the AONB. McQuitty Landscape Design (MLD) carried out an assessment, which is referred to in this section.

This section is not an LVIA, rather it references the LVIA and makes use of its approach and methodology to better locate the proposed zonings in a manner that achieves the objectives of securing a traffic free route from the town centre of Larne to Ballygalley and the social and health benefits contained therein without adversely affecting and preferably benefitting the visual resources of the area. The LVIA can be made available if required.

5.2 Methodology

MLD prepared the LVA with reference to guidance contained in the "Guidelines for Landscape and Visual Impact assessment" (GLVIA 3rd Edition, 2013), published by the Landscape Institute and the Institute of Management and Environmental Assessment.

The approach involved detailed desktop survey of published material on the landscape of northern area and its wider context. Material included maps, photographic evidence, historic landscape and cultural data. Fieldwork enabled the recording of various landscape elements such as topography, land use and vegetation. From the analysis of this combination of material, it was possible to carry out an evaluation of landscape character and assess the predicted effect of the proposed development.

A visual assessment comprising of field survey work was undertaken and a series of viewpoints were established that were representative of the different groups of receptors whose views may be affected. The field survey work was undertaken from within publicly accessible areas only: views from private properties and commercial buildings were approximate and were estimated, with reference to the nearest publicly-accessible location from which assessment could reasonably take place.

The methodology enabled the establishment of a baseline from which analysis could take place.

5.3 Existing Conditions

Within the northern part of the area outside of the NIHE ownership, the lands are predominantly laid out in small fields managed as low intensity grazing. Large stands of gorse, particularly on steeper slopes partly reflect the low level of agricultural management.

This northern area is effectively enclosed by existing housing on three sides; the large-scale housing development of the Woods to the west, housing along Branch Road to the north and a strip of linear housing along the Coast Road to the north east. The map opposite demonstrates this clearly.

Once the zoned housing land, owned by NIHE, has been developed as shown on the map, the undeveloped land will be surrounded on virtually four sides.



The broader landscape setting is an undulating lowland coastal strip to the east of the high Antrim plateau moorland. Various narrow glens come down from the plateau to the coast, including a minor shallow valley in the vicinity of Branch Road at the northern edge of the lands.

The coast road is on a narrow platform (geologically described as a raised beach); it lies some way below the whole of the undeveloped lands. Views north along the coast road from Larne show a succession of steep basalt cliffs and rocky headlands inland of the Coast Road.

Within the undeveloped land levels vary considerably but generally the highest land is to the south where the headland rises to around 60m AOD. By contrast, the northern end of the land near the old mill is significantly lower at approximately 11m AOD. The zoned housing area is at this higher level.



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The general pattern of vegetation on this coastal strip is of comparatively open headlands contrasting with more vegetated side valleys or glens. Much of the tree cover is found on the steeper slopes in the side valleys. There is in addition significant tree cover around some of the former estates and small demesnes such as Carnfunnock, Carncastle and Cairndhu a few kilometres to the north.

Blocks of gorse are found mostly on the steeper rocky terrain. Back from the immediate coastal edge, is a strong overlay of small fields, the boundaries of which are mostly defined by hedgerows with a proportion of small hedgerow trees. In places, these hedges have been replaced by post and wire fences.

The undeveloped land both within and beyond the zoning reflects a number of these different elements of the wider landscape. Gorse has taken over large parts of the steeper slopes on the headland, reflecting a low intensity of land management. There are remnant hedgerows subdividing the area, some of which contain significant numbers of small scrubby trees. The boundary with the existing housing is suburban in character with a mixture of fencing of different styles as well as sections of evergreen ornamental hedging. Scrub vegetation is found on some of the steep slopes between the eastern edge of the undeveloped land and the Coast Road below.



NORTH LARNE DEVELOPMENT STUDY Land Identification Plan MLD/01



Branch Road is located in a small side valley a short distance beyond the northern edge. In keeping with many of these side valleys, there is more tree cover and other vegetation, and this is also reflected in the boundaries on the northern edge.

There are no built structures on the northern part of the undeveloped land.

The character is very much influenced by the presence of extensive areas of housing along the entire western and northern boundaries, as well as a strip of linear housing on the Coast Road along part of the eastern boundary.

A former mill building is located off Branch Road at the northern edge, while a redundant treatment works lie just outside the boundary below the highest ground on the headland. Access to these works is from the Woods.

There is no public right of access at present and the network of public access in the vicinity is comparatively limited. However, Carnfunnock Country Park is an important public open space facility, linked by a footpath along the Coast Road from a car park at Drains Bay.

The Coast Road is included as an 'on road' section of National Cycle Route 93.

There are areas of public open space in north Larne including land at Seacliff Road that accommodates a range of provision, an informal area on Old Glenarm Road, a bowling club on Glenarm Road and the Chaine Memorial Park.

The promoted 'Ulster Way long distance footpath is a considerable distance away, coming at is closest point to the edge of the cliffs at Sallagh Braes some 5 kms to the west.

The A2, the main coastal road along the north coast, is a major tourist route. The Black Arch, a short tunnel cut through the headland below the undeveloped land, not only marks the approach to Drains Bay but also is a marker at the beginning of the tourist route going north. It also falls on the line of the AONB boundary.

Branch Road has already been referred to just beyond the northern end of the land. This is an important local link road from the Coast Road to the Old Glenarm Road which is the main north south route connecting the suburban areas of north Larne with the town centre.

Various other minor roads and lanes crisscross the coastal strip between Larne and Ballygalley some 3.5kms to the north.

Larne is has been chosen as the entry point into Northern Ireland for both the EuroVelo cycling route and the Appalachian Trail walking route.



Response to Local Development Plan Strategy

Published Landscape Character Assessments 5.4

Landscape character is defined as a distinct and recognisable pattern of elements that occur consistently in a landscape and how people perceive it. It reflects combinations of geology, landform, soils, vegetation and land-use, and human settlement. It creates the particular 'sense of place' of different areas of the landscape.

Published landscape character assessments relevant to the proposals are the Northern Ireland Landscape Character Assessment last updated November 2006 and the Northern Ireland Seascape Assessment, published on-line in 2014.

The Northern Ireland Landscape Character Assessment subdivided the countryside into 130 'Landscape Character Areas' (LCAs), each based upon local patterns of geology, landform, and land use, cultural and ecological features. For each LCA, the key characteristics were described and an analysis of landscape condition and its sensitivity to change was made.

The NI Landscape Character Assessment places the area within the LCA 126 Larne Coast while at a more local level of assessment, the land lies on the junction of two of the Northern Ireland Local Landscape Character Areas Local Landscape Character Area 20 - Belfast Lough and Islandmagee to the south and Local Landscape Area 18 - Antrim Plateau and Glens to the north. This is significant because it reflects the land's transitional location between the urbanised area of Larne to the south and west and the scenic coastal landscape to the north.

The urban area of Larne surrounds the undeveloped lands, it extends beyond the northern edge and heavily influences the landscape character of the whole area and that of the undeveloped lands in particular.

Therefore the undeveloped lands are not typical of most of the rural LCAs, due to the dominant presence of the adjoining urban area which enfolds them on three sides. This is especially pronounced at the northern edge where the existing housing along both sides of Branch Road effectively cuts the undeveloped lands off, in landscape character terms, from the main body of Local Landscape Area 18 -Antrim Plateau and Glens.

Like the Local Landscape Character Assessment, the Northern Ireland Regional Seascape Character Assessment 2014 also reflects the area's transitional position with the boundary of two Seascape Areas meeting on land at the Black Arch just to the east of the northern area on the Coast Road.



Key Landscape Issues to Inform Development Proposals 5.5

The analysis confirms that while the land lies on the boundary between urban and rural areas, landscape character areas and landscape types it has a predominately urban context.

The topography, vegetation cover and buildings concentrate the key views of the area to those from the north along the Coast Road.

Viewpoint 1 (overleaf) illustrates these aspect and topography issues; in the viewpoint from Drains Bay the undeveloped land can be seen wrapped by the existing development and extending onto the skyline and headland. It is noted that the land on the skyline and headland is the zoned housing land owned by NIHE.



Response to Local Development Plan Strategy

Viewpoint 1



View from picnic area at Drains Bay opposite public car park Grid reference: NW 53899 60885

In the viewpoint only parts of the northern area of the undeveloped land are visible, in particular field B is unseen. Further the viewpoint supports the conclusion that the urban area of Larne forms the visual context of the whole of the undeveloped land, especially the northern part of the area which is currently enclosed on three sides by urban development.

The subsequent viewpoints 2 and 3, shown below, support these conclusions that only parts of the northern part of the undeveloped land are visible while the southern part which is zoned for housing is prominent and that the whole area lies within an urban context.

Viewpoint 2 illustrates that from further away, it is located at Carnfunnock Bay, the zoned land is less prominent and the Caterpillar factory forms a large mass on the skyline. It remains clear that the northern part of the undeveloped lands is enclosed by the urban area of Larne. Again only part of the northern area is visible in the viewpoint.

Viewpoint 2



View from public car park by rowing club at Carnfunnock Bay Grid reference: NW 53772 62028

In these farther viewpoints the urban context is significant in framing and providing the backdrop for the lands with the Caterpillar factory in particular visible in juxtaposition with the headland and the suburban parts of Larne extending up the hills to the west of the study area.

Viewpoint 3 is taken from further away again, this time on the coat road at Ballygalley Head,



Response to Local Development Plan Strategy

Viewpoint 3



View from Coast Road at Ballygally Head Grid reference: NW 53770 62558

Again, the same urban context encloses the northern part of the undeveloped land, the bulk of the Caterpillar factory breaks the skyline above the headland and the housing areas in North Larne and beyond in west Larne can be seen extending over the hills above the lands.

These photographs provide a fairly graphic illustration that the undeveloped lands have an urban context.

Views from the south are non-existent. Viewpoint 4 illustrates the extent of the view from Carnfunnock Visitor Centre.

The viewpoints also graphically show the urbanised character of the coastline in this location, the settlement limits of the Larne Area Plan show that it is largely currently defined as developed coast while this photographic analysis shows that there is no visual rationale for a re-designation in the forthcoming plan.

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Viewpoint 4



View from Carnfunnock Country Park Visitor Centre Grid reference: NW 53464 61887

The analysis shows clearly how the issues should be addressed; these are: -

- The Caterpillar factory is prominent but some mitigation of its effects is possible;
- Parts of the undeveloped lands are also prominent where they meet the headland, it should be • noted that these lands, in NIHE ownership, are zoned in the current Larne Area Plan;
- The northern part of the undeveloped land is enclosed by the urban context; and •
- Parts of the northern area are not visible at all. •

Accordingly, in principle the prominent and visible land should be utilised for open space with less prominent or not visible land being used for development as shown on the opportunities and constraints drawing below.



Response to Local Development Plan Strategy

Opportunities and Constraints



- 1. Main potential area for residential development
- Area on knoll of higher ground where built development should be avoided—could possibly be planted (currently zoned
- housing land) 3. Further potential development area
- 4. Vehicular link between 1 and 3
- 5. Possible small public car park
- 6. Additional screen planting for car park
- 7. Need for screen planting around former sewage treatment plant
- Area of public access
 Indicative line for potential public footpath
- 10. Panoramic viewpoint
- 11. Pedestrian access
- 12. Pedestrian access
- 13. Old Mill Area with potential for visitor facilities/holiday lets/car parking etc
- subject to owner agreement, financial viability within development etc
- This part of potential development area is visible in some of the wider views and will need particular architectural sensitivity in design and layout

NORTH LARNE DEVELOPMENT STUDY

Opportunities and Constraints MLD/18



Response to Local Development Plan Strategy

5.6 Conclusion

Visually the assessment supports the creation of a set of interrelated open space and residential zonings through the undeveloped lands that collectively can be delivered by private developers and can be used to create a walking and cycle route from the Chaine Memorial Park to Drains Bay.

The next sections look at the advantages of this approach, how it supports the growth of the town and how the plan strategy should approach the policy issues raised.



Response to Local Development Plan Strategy

6. Strategic and Local Advantages

6.1 Strategic Matters

The Spatial Strategy of the RDS is based on a concept of Gateways (the main ports of entry to the region), Hubs (the main settlements) and corridors (the major road and rail network serving the region). Each of these elements provides advantages for the range and scale of development which individual settlements can potentially attract. Where settlements have more than one designation, the advantages in attracting development are enhanced.

Larne is one of a limited number of settlements in Northern Ireland which are both Gateway and Hub, and located on a major Corridor, adding to its development potential. Despite this, the town has not over the years achieved growth to match its potential. This is now changing driven by a number of factors.

Larne is located on the Trans-European Networks (TENs) route on the east coast corridor of Ireland from Cork, through Dublin to Belfast and linking to routes in the rest of the UK and on to Europe via the ferry link to Cairnryan. The recent completion of the upgrade of the A8 route to dual carriageway has significantly strengthened this route.

Larne is located close to tourist attractions which are now known on the world stage thanks to the rise in the tourist profile of Northern Ireland and the success of the Council's restoration of the Gobbins cliff path. These provide the basis for Larne to capitalise on its strategic location on the Causeway Coastal Route, and in particular on the town's role as Gateway to the Antrim Coast and Glens.

These factors which are now enabling the development potential of Larne to be increasingly realised, contrast with the other major towns in the Borough whose economic base was focused on large industries. Regrettably the picture in Antrim and Ballymena is one of factory closure and the shedding of jobs while in Larne the tourist potential continues to grow.

To fully capitalise on its potential, Larne needs to develop a critical mass of attractions including its association with the scenery of the Coast Road, filming locations, international walking routes (the Appalachian Trail) and international cycling (the Eurovelo).

In relation to walking and cycling, the main walking and cycling routes are to the north of Larne; there is, for example no link between the town and the Ulster Way. Both the Eurovelo cycling route and the Appalachian Trail, the international walking route tracing the mountain orogeny that links Norway to Alabama through Scotland and Ireland also comes ashore at Larne. More locally, the connection between the town and Carnfunnock Country Park relies on a three and a quarter kilometre walk along the Coast Road involving exposure to traffic.

Tourist Potential



6.2 Local Aspects

Meeting the issues of health and wellbeing identified in the Community Plan involves interventions in the community's travel culture, to promote walking and cycling as viable alternatives to private car use. To achieve this links between housing, school, work and shopping places need to be created and strengthened while safe routes to school and work need to be developed and promoted. Accordingly, Sustrans has been commissioned to prepare a master plan for the development of cycling and walking in the town.

The Sustrans master plan builds on the existing incomplete network of paths to create a loop around the town linking the port to the northern and western suburbs; parts of the network are on existing linear parkland while other parts depend on creating additional space on main and secondary roads.



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In the north the master plan relies upon the Coast Road to provide its connection beyond the Chaine Memorial Park, this is a relatively dangerous route, exposed to traffic on a road that cannot be easily widened and does not have much available width. The proposed north Larne greenway would address this deficiency removing around 2.5 kilometres of foot and cycle way from the main road.

Existing Pedestrian and Cycling Infrastructure



Provision of the proposed route would enable most of the link to Carnfunnock Country Park to be delivered traffic-free with the only on-road section being on part of Drains Bay over a distance of around 650 metres.

The proposed greenway is therefore a vital link in the provision of walking and cycling infrastructure, it helps to deliver a change in travel culture by connecting to the neighbouring housing and providing safe, traffic-free links to both school and work.

Safe Routes to Work and School 6.3

Central Government policies seeking to promote walking and cycling including "Exercise Explore Enjoy" the strategic plan for Greenways, and "Changing Gear" the NI cycle strategy seek to improve Enabling people to feel safe while walking or cycling is considered to be of considerable importance in this context. Safe routes to school and work are therefore key elements of any strategy seeking to change the pattern of transport use and re-balance it towards walking and cycling.

A traffic-free route through the north Larne area that enables in whole or in part safe connections between housing areas and schools and businesses will accordingly play a strategic role in promoting a change in travel behaviour.

Potential Safe Routes to School - Northern Area





connectivity and accessibility in towns by improving the opportunities to walk and cycle including encouraging walking and cycling to meet every day needs such as going to work, shopping or school.

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The drawing above highlights the potential safe routes to school and work in the northern part of the undeveloped lands, in particular it highlights: -

- The central role of the proposed greenway in traffic-free distribution; and
- The inter-connectivity between the greenway route and the proposed new integrated primary school site

The southern part of the lands below highlights similar.

Potential Safe Routes to School and Work - Southern Area

In particular the route provides connections for the housing areas north and south of the Caterpillar factory to link up without needing to use the Old Glenarm distributor road.

The drawings also show the potential safe routes using secondary streets to connect both between the main land uses and to and from the proposed greenway. The potential link to the Caterpillar factory is highlighted, its development would enable access by workers from both sides encouraging walking and cycling using the wider network.



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7. Strategic Policy Proposals

7.1 Introduction

This will be the first development plan for the Borough prepared under a plan-led system, in which planning applications have to be determined in accordance with the plan unless material considerations indicate otherwise. This has important implications for the content and drafting of policies, since if the plan does not accommodate development subsequently proposed, however desirable that might be, then refusal must follow.

The only certainty in planning is that the future is uncertain and that forecasts and assumptions made to underpin plan proposals have a high probability of not being accurate. While there has to be an awareness of past trends, for the plan-led system to deliver for the Borough, the emphasis in the LDP must be on shaping the future of the Borough in a positive way by identifying opportunities to facilitate growth which will enable the Borough to progress; and on providing policies which are positively worded to build on the Borough's advantages rather than focusing on where development cannot occur. Proposals for Strategic policies to be included in the LDP follow.

7.2 Housing growth in Larne

The proposals for the future growth of Larne should not reflect its past performance, but should provide the basis for realising the strategic advantages of its location which are now being reflected in increased development interest in the town. The LDP should recognise in allocating housing growth between the main towns, the potential to enhance the role of Larne as a key driver for growth for the entire Borough, and allocate land accordingly.

7.3 Choice of lands for housing within Larne town

The location of Larne as a coastal town, and the restraint to development to the south presented by the presence of higher land with poor access on the Inver side of the town together with the barrier to access presented by the A8 dual carriageway, have directed the growth of Larne to the west around Millbrook and to the north-west at Ballycraigy. The result is that housing areas zoned in the Larne Area Plan are over 3.5 kilometres from the town centre, some major employment locations, and from major public transport links by bus and rail to Belfast.

This degree of remoteness has the potential to militate against shifting modal split for journeys within the town from use of the car to other more sustainable means of travel, including public transport, cycle and walking. Sustrans has prepared a Cycle Strategy for Larne at the request of the Council in order to promote increased use of bicycles and walking.

However, the preparation of the LDP enables a positive approach to be taken towards sustainable travel modes through the criteria used in selecting lands for future housing growth. Significant weight should be given to the proximity and connectivity of potential sites to employment locations, community facilities and the town centre, in order to facilitate cycling and walking.

Proximity to the town centre is considered to be particularly important in providing support for its major retail and community facilities. At a time of increasing threat to the well-being of town centres in general, a closer relationship between zoned housing lands and the town centre should be a priority. This is particularly important in Northern Ireland where town centres have an important community role as neutral territory.

The plan requires a positive policy to emphasise the importance of connectivity, particularly proximity to the town centre, in the choice of housing lands. In the case of the northern part of the undeveloped lands, map 10.1 on page 219 of the POP shows clearly that the lands are enclosed by development on three sides; and they are not subject to any of the nature conservation or heritage designations which apply to the AONB to the north of Ballygally. While they contain lands designated as open space in the vicinity of the Black Arch, their overall character is determined by the proximity to urban development and not by unspoilt landscape as is the case with the core areas of the AONB to the north.

In connectivity terms, they are only 2.5 kilometres from the town centre, much closer than zoned housing areas to the west and north-west; 600 metres from the Caterpillar factory on Old Glenarm Road and Larne port; and close to primary and secondary education. Despite its location within the AONB, the northern part of the undeveloped lands has significant advantages in sustainability over further expansion of the town to the west and north-west. The criteria used for selecting housing sites should allow judgements to be made on the suitability of sites and not incorporate a blanket exclusion based on particular criteria.

7.4 Greenways

The LDP must also contain policies to facilitate provision for safe routes for cycling and walking, preferably off road, through the development of Greenways. This is necessary at strategic level to provide for long distance routes between towns and cities, but, equally if not more importantly, to identify and protect opportunities to develop an internal network of Greenways within Larne town itself.

In November 2016, the Department for Infrastructure published A Strategic Plan for Greenways. The Strategy identified a potential network of long-distance greenways throughout Northern Ireland to be developed by Councils and Departments. The Strategy included a greenway linking Belfast to Larne and terminating in the town.

The Strategy included at Appendix A reference to Eurovelo, a Europe wide network of cycle routes to connect the continent. Eurovelo1, the Atlantic Route, runs from Scandinavia to Portugal via the British Isles, and enters Ireland through the port of Larne, reinforcing the strategic importance of the town as a gateway to Northern Ireland,

In February 2018, the Council published a Cycling Routes Masterplan for the Borough and its main towns, including Larne, prepared by Sustrans. This takes the Greenway Strategy down to local level and



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illustrates a future potential cycling network within the town. The Larne map extracted from the report is shown below.

The preparation of the LDP must take account of the Greenway Strategy and the Cycling Routes Masterplan by: -

- Designating identified routes for protection; and
- Providing for a flexible approach to implementation.



While to date the lead in the development of Greenways has largely been placed with the public sector in relation to the regional network, the LDP should facilitate provision by the private sector, particularly for local Greenways within the town, in association with the preparation of Master Plans for development sites. The importance of this provision lies in the accessibility of local Greenways to a greater number of people and their potential to make a greater contribution to modal shift, and reduction in air pollution and greenhouse gas emissions.

The Cycling Routes Masterplan identifies on page 32 a network of potential cycle routes within Larne. Choice of lands to be zoned for housing in the LDP should take account of opportunities for the private sector to provide elements of the network, either as suggested in the Masterplan, or preferably as a segregated route through housing lands.

Two routes are relevant in relation to the North Larne area in general and to the undeveloped lands in particular:

- The route along Old Glenarm Road from Seacliff to the Larne Leisure Centre; and
- The route along the A2 Antrim Coast Road to Drains Bay.

Neither routes are segregated from existing roads.

The Cycling Masterplan also shows at page 51 a number of circular routes to 'fill in the gaps between the National Routes and greenways to ensure a Council wide network. The routes radiate out from towns and villages that would benefit from the money cyclists would spend on refreshments in the villages." Of relevance to Larne is the Causeway Coastal Route between Larne and Ballygally using existing roads.

The Greenway proposed in this Development Study offers the provision of a safer off-road alternative for significant parts of both proposals in the Cycling Masterplan.

Strengthening Tourism in the Borough 7.5

The LDP should identify opportunities to unlock the potential for tourism growth by taking a strategic approach to the development of long-distance walking routes. This is one of the major growth areas in tourism and one for which there is great potential within the Borough. The LDP should include strategic policies to develop connectivity between the significant tourism attractions and facilities within the hinterland of Larne town, to seek to spread the benefits more widely and into Larne town itself.

South of the town on Islandmagee, the Council's Gobbins development has been a major success and the Council has made a bid for funding through the Belfast Region City Deal to extend the Gobbins' Cliff and Coastal Path to Heddles Port, doubling the length to 1.5 miles. To the south towards Black Head and to the north of the Gobbins there are shorter existing walks at Skernaghan Point and Port Muck.

To the north of Larne, the Ulster Way, Northern Ireland's major regional walkway, runs at some distance from Larne town and the Antrim Coast Road,

The lesser known International Appalachian trail runs through Eastern North America and has been extended into western Europe into areas of similar geological makeup. The Ulster ~Ireland Chapter of the International Appalachian Trail was established in 2011 and, in contrast to the Ulster Way, runs from Larne along the Coast Road to the north of Larne, and onwards through the Antrim Coast and Glens AONB to west Donegal in the Republic. As with Eurovelo, Larne has a significant strategic role in the IAT which the LDP should recognise and promote as the entry point to Northern Ireland for major international walking and cycle routes.



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Specifically, the LDP should propose strategic policies:

- To link existing walking facilities on Islandmagee into a continuous coastal walkway from Whitehead to Larne;
- To link Larne directly by walking into the Ulster Way in the vicinity of Ballygally. This route should be off-road as far as practicable and would also provide an new off-road route for the International Appalachian Trail in this location; and
- To recognise the role of the town as the hub for major cycle and walking routes for the East Antrim coast and the Antrim Coast and Glens.

The proposed Greenway through the Woods proposed housing lands has a potentially significant role in providing such an off-road walking route for both the link to the Ulster Way and the route of the IAT between Drains Bay and Larne town centre.



Response to Local Development Plan Strategy

Master Plan Proposals for North Larne 8.

The proposals in the Masterplan for north Larne have been developed in the context of the Landscape Assessment contained in part 5 of this submission. This concludes that in terms of the Antrim Coast and Glens AONB, the whole of the undeveloped land has an urban context including the northern part, which lies within the AONB but is nonetheless surrounded on three sides by development and bounds development lands on the fourth.

The development strategy for the undeveloped land seeks:

- To identify opportunities for housing where this can be sited sensitively to the landscape character and can bring betterment to the quality of the edge of settlement location;
- To enable and deliver a privately funded community greenway linking the area with its surroundings and fulfilling strategic objectives of providing traffic-free walking and cycling infrastructure and promoting a change in travel culture; and
- To protect and enhance the quality and accessibility of lands which contribute to the landscape character of this part of the AONB, in particular the headlands which are subject to prominent development.

The Masterplan proposes:

- Housing
- Open space in the form of a public park; and
- A Greenway through the parklands.

Housing is proposed in a series of pockets extending from north to south. In the northern part of the undeveloped lands the lower areas adjoining the existing Woods development can be developed without significant impact on the AONB, with access taken from an existing cul-de-sac. The emphasis in the proposed housing is to achieve a type, scale and design of housing which is sensitive to the landscape character and can enhance the quality of the edge of settlement location. In particular on the extreme northern edge, where the lands are visible from the Coast Road and the adjacent development has more architectural quality than housing closer to the town centre the design concept incorporates a 'conservation style' approach and a mix of housing to reflect its setting. The emphasis in design is to create a 'sense of place' at this important boundary between the urban area of Larne and the AONB.

The second area of proposed housing is in the gently sloping field adjacent to the Woods. The design concept for this area is for low density housing with plot sizes to respect those in the existing Woods development. The proposed development would achieve through the design of the housing and new tree planting a better visual edge to the settlement than currently exists.

The third area of housing is located south of the Woods on lands currently zoned for residential use. The Coastal Park would cut into a part of this area and will protect the headland from intrusively prominent development while providing a vital role in overseeing the open space. A low to medium density of development is appropriate in this sensitive location.

The greenway extends south beyond the Caterpillar factory; proposals for its delivery are set out in section 4.3 above.

The Master Plan is shown overleaf.

MFA-DPS-055



The Masterplan proposes a Coastal Park linking from the northern edge south to the Caterillar factory. This will protect the environmentally sensitive parts of the land adjacent to the cliff line above the Antrim Coast Road as open space, and open to the public lands which are presently inaccessible. The Masterplan proposes a walkway in the proposed Coastal Park which can provide the first stage in the development of a Greenway to Larne town centre, Larne Port and employment locations in their vicinity. This can contribute to the development of the cycle network for Larne town contained in the Council's Cycling Masterplan and to strengthening the role of Larne as the gateway to the Antrim Coast and Glens AONB for walking and cycling.

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Designed by Scottish engineer William Bald and constructed between 1832 & 1842 for a cost of £37,000 (£12,000 over budget). Bald devised the construction of the road by blasting the coastal cliff face (around 30,000 yd³ of rock in total), with the resultant stone left lying on the shore forming the foundations for the road. It was a significant engineering feat for it's time, and helped link the Glens to the rest of Northern Ireland, as they were previously cut off due to a lack of access routes. Previously, people considered sailing to Scotland as an easier trading route, therefore the Coastal Road played a significant role in increasing economic and trade prospects up and around the north-east coast of Antrim and within Northern Ireland as an entirety.

Upgrades were made to the road in the late 1960s, following significant rock fall onto the road as the result of heavy storms. Cliff face was netted in some places. The Victorian railings, which run for significant lengths of the coastal route, are Grade B2 Listed.







Designed by Scottish engineer William Bald and constructed in parallel with this portion of the Coastal Road (between 1832 & 1842), the Black Arch tunnel acts as a gateway earmarks the start of the Antrim Coast Road to the northern edge of Larne. This archway is Grade B2 Listed.

Many people consider the 'White Arch' located at Waterfoot as the opposing gateway however, this was not constructed in parallel with the Coastal Road, but a little later in 1873, as a pier for a bridge for the Glenariff Iron Ore and Harbour company, as part of Ireland's first 3 foot gauge railway.

Extent of the Causeway Coast & Glen Area of Outstanding Natural Beauty

CURRENT vs PROPOSED ZONING OF LANDS



EXISTING ADJACENT WALK & CYCLE ROUTES





Existing walkways running adjacent to our site include the Highway to Health, running from Larne

Leisure Centre to Carnfunnock Country Park and the Ulster Way, which we propose could be redirected through our proposed greenway to provide heightened safety for walkers, whilst optimising the spectacular views from the cliff edge. We would propose that the existing walk running from Carnfunnock Park to Drain's Bay be extended and incorporated into our proposals, perhaps providing a finishing point with a view point to the top of the Black Cave Arch. We believe that an extension of the greenway beyond the extents of our site to link in with the coastal pedestrian footway linking Chaine Park with Larne Leisure Centre, as dashed on the above map, would provide a fantastic pedestrian route that would be easily accessible to the residents of Larne and beyond, with bus stops located at various locations on the proposed route.



SEAVIEW WOOD



CHAINE PARK LEADING TO LEISURE CENTRE



& Port