



Local Development Plan 2030

Technical Supplement 7

Tourism

September 2019

www.midandeantrim.gov.uk/planning



**Mid & East
Antrim**
Borough Council

Contents

List of Tables

1.0 Introduction	3
Purpose of this document	3
Planning and Tourism	3
2.0 Policy Context	4
Regional Policy Context	4
Local Policy Context	
3.0 Tourism Profile	10
Key Assets and Tourism Resources	10
Tourism Statistics and Performance	11
4.0 Preferred Options Paper	14
5.0 Consultee and Councillor Engagement	15
6.0 Draft Plan Strategy Policy Approach	16
7.0 Soundness	17

Appendices	18
APPENDIX A Tourism Statistics	
APPENDIX B Evolution of relevant draft Plan Strategy policy (General Policy and Tourism policies TOU1-TOU8)	

List of Tables

Table 2.1 Neighbouring Councils Position on Tourism

Table 3.1 Overnight trips and expenditure on overnight trips – 2012 - 2018

Table 3.2 Commercial (Tourist) Accommodation – 2018

Table 6.1 Amendments to the POP Preferred Option for Key Issue 11

Table 7.1 Consideration of Soundness

1.0 Introduction

Purpose of this document

- 1.1 This technical supplement brings together the evidence base that has been used to inform the preparation of the Mid and East Antrim Local Development Plan (LDP) 2030 draft Plan Strategy. It is one of a suite of topic based technical supplements that should be read alongside the draft Plan Strategy to understand the rationale and justification for the policies proposed within it.
- 1.2 This technical supplement builds upon and updates LDP Position Paper 7 Tourism which provides baseline information on Tourism and formed part of the evidence base for the Preferred Options Paper (POP). It provides an overview of the regional and local policy context and the tourism profile of Mid and East Antrim. In addition, it demonstrates how the various strands of the evidence base have been considered in the formulation of SGS8 Tourism Strategy and the eight operational subject policies relating to tourism (Policy T0U1- Policy T0U8) in the draft Plan Strategy, including responses to the POP and ongoing consultee and councillor engagement.

Planning and Tourism

- 1.3 Tourism encompasses a very wide range of activities. It can include travel and visits for business, professional and domestic purposes as well as for holidays and recreation. Often, more than one purpose may be involved. The duration of tourist trips is also highly variable as it can include the annual family holiday as well as a wide range of shorter visits, weekend breaks and day trips. Tourism is therefore an extremely diverse form of activity which is subject to changing trends in the types, distribution and duration of tourist activity.
- 1.4 Tourism spending helps to support a wide range of economic activities. As well as direct spending on tourist accommodation¹ and use of tourist amenities², tourism plays an important role in helping to support the viability of many local suppliers, services and facilities. It improves assets and provides infrastructure for local people and tourists. Through utilising existing environmental, historical, cultural and geographic assets, tourism can be a key economic driver capable of stimulating further growth and development opportunities.
- 1.5 However, whilst tourism provides economic opportunities within our Borough, it must be balanced with the safeguarding of our tourism assets from unnecessary, inappropriate or excessive development as this is a vital element in securing a viable and sustainable tourism industry.

¹ Overnight sleeping accommodation for tourists provided by way of trade or business (Art 2 Tourism NI Order 1992).

² An amenity, facility or service provided primarily for tourists, but does not include tourist accommodation (Art 2 Tourism NI Order 1992).

2.0 Policy Context

Regional Policy Context

Draft Programme for Government 2016-2021

- 2.1 At the highest level, the NI Executive has set out its priorities in the draft Programme for Government (dPFG) 2016-2021. Its overall purpose is to improve wellbeing for all, by tackling disadvantage and driving economic growth. It sets out 14 strategic objectives and tourism is identified as one of the building blocks to underpin its priority of growing a sustainable economy and investing in the future. One of the framework's indicators is 'improving the attractiveness of a destination', measured by the total spend by external visitors.

Regional Development Strategy 2035 (RDS)

- 2.2 The RDS, the spatial strategy of the Executive also recognises tourism as a key element underpinning sustainable economic growth in Northern Ireland and Regional Guideline 4 (RG4) seeks to promote a sustainable approach to the provision of tourism infrastructure. The RDS emphasises the need to support the growth of tourism in NI by achieving balance between tourism development opportunities and conserving natural, built and cultural heritage assets.
- 2.3 Both Ballymena and Larne towns are specifically identified in the RDS in relation to tourism. Firstly, Ballymena's proximity to the nearby tourism attractions, including the Causeway Coast and Glens and historic Slemish Mountain is highlighted and secondly, Larne's position on the Causeway Coastal Route is recognised as having the potential to create a centre for tourism.
- 2.4 Tourism is also identified in SFG13 as one industry that can provide jobs and opportunities in rural areas as long as they are integrated appropriately within the settlement or rural landscape.

Strategic Planning Policy Statement (SPPS)

- 2.5 The SPPS was published by the former Department of Environment (DOE) in September 2015 and it combines the strategic elements of the existing Planning Policy Statements to provide the overarching regional planning framework.
- 2.6 The approach within the SPPS supports the RDS and is to manage the provision of sustainable and high quality tourism developments in appropriate locations within the built and natural environment. The planning system is recognised as having a key role in managing tourism related development through planning policies that provide a framework for identifying appropriate development opportunities and safeguarding tourism assets from harmful development.
- 2.7 The SPPS states that there should be a general presumption in favour of tourism development within settlements, subject to meeting normal planning requirements. However, in the countryside tourism development should be carefully managed in the interests of rural amenity, wider sustainability objectives and the long term health of the tourism industry. Councils are required to bring forward a tourism strategy, together with appropriate policies and proposals that must reflect the aim, objectives and policy approach of this SPPS, tailored to the specific circumstances of the plan area. The strategy should be informed by early engagement with relevant stakeholders and reflect wider government tourism initiatives and may address the following:
- how future tourism demand is best accommodated;
 - safeguarding of key tourism assets³;
 - identification of potential tourism growth areas;
 - environmental considerations; and
 - contribution of tourism to economic development, conservation and urban regeneration.

³ A tourism asset can be regarded as any feature associated with the built or natural environment which is of intrinsic interest to tourists.

- 2.8 Policies in the LDP should:
- safeguard tourism assets;
 - provide direction for the assessment of tourism development such as tourism accommodation (hotels, self-catering, holiday parks etc.), and tourist amenities (visitor attractions, leisure/recreation facilities etc.); and
 - promote high quality design and integration of tourism development with the necessary infrastructure.

Draft Marine Plan for Northern Ireland

- 2.9 The draft Marine Plan (2018) combines the plans for both the inshore and offshore regions and will inform and guide the regulation, management, use and protection of the Northern Ireland marine area. One of the Key Activity Policies in the document is for Tourism and Recreation, which states that such proposals will be considered favourably where there will be no unacceptable adverse impact on marine activities, uses and/or the marine area and public access to the marine and coastal area is retained.

Planning Policy Statements and Supplementary Guidance

- 2.10 Planning Policy Statement 16: Tourism (PPS 16) published in June 2013 sets out eight planning policies for tourism development (see Appendix B) that are sustainable, beneficial to the local economy and sensitive to the value of our tourism assets. It seeks to manage the provision of sustainable and high quality tourism developments in appropriate locations within the built and natural environment.
- 2.11 Planning Policy Statement 21 Sustainable Development in the Countryside (PPS 21) provides various opportunities for tourism development in the countryside. For example, proposals for appropriate tourist amenities, single unit self-catering accommodation, touring caravan/campsites, bunk houses and camping barns could potentially meet the policy tests set out in Policy CTY 11 (Farm Diversification) particularly where the proposal involves the reuse or adaption of existing farm buildings. Similarly, Policy CTY 4 of PPS21 provides opportunities for the conversion and reuse of existing buildings in the countryside for tourism proposals.

Other Reference Policies, Strategies and Documents

- 2.12 There is a wide range of other strategies and documents relevant to tourism at a regional and sub-regional level produced by government departments and agencies. These have been included in Position Paper 7 Tourism published at LDP POP stage and have not be repeated in this technical supplement.

Local Policy Context

Legacy Area Plans

- 2.13 The existing development or area plans that apply to Mid and East Antrim Borough are:
- **Ballymena Area Plan 1986-2001, adopted in 1989**
 - **Larne Area Plan 2010, adopted in 1998**
 - **Carrickfergus Area Plan 2001, adopted in March 2000**

The draft Plan Strategy (para 2.2.3) refers to the somewhat complex situation in regard to the status of the Belfast Metropolitan Area Plan 2015 (BMAP) which included the former Carrickfergus Borough Council area. Whilst the Carrickfergus Area Plan 2001 remains the extant statutory plan for this area, the draft BMAP (2004) as the most recent expression of local planning policy, has also been taken into account in developing the draft Plan Strategy.

- 2.14 Whilst the draft Plan Strategy has taken account of the existing Area Plans, it has also been necessary to consider their longevity and the fact that all pre-date even the original version of the Regional Development Strategy, published in 2001. They also pre-date PPS 16.

Ballymena Area Plan 1986-2001

- 2.15 Whilst the plan did not recognise Ballymena District as a prime tourist area it was viewed as an important link between Greater Belfast and the popular resorts of the North Coast. The main attractions to visitors in the District are listed as:
- The ancestral home of US President Arthur, in Cullybackey
 - Slemish Mountain
 - Gracehill Village
 - Portglenone Forest Park
- 2.16 In regard to policy for non-residential development in the countryside, the plan states that sympathetic consideration would be given to projects designed to facilitate the tourist industry. It further advised that planning applications for hotels and guest houses would be treated on their merits.

Larne Area Plan 2010

- 2.17 The plan recognises Larne Borough as one of the most scenically impressive areas of NI with potential to attract increased numbers of tourists. The principal attractions of the Borough are listed as follows:
- The coast
 - The glens of Glencloy and Glenarm
 - Islandmagee peninsula
 - Antrim Coast and Glens AONB (which takes in a large part of the Borough to the north of Larne town)
- 2.18 The plan also recognises that tourism made an important contribution to the local economy and had potential for considerable future growth. However, it was stressed that the development of this potential should not take place at the expense of the natural and man-made assets that attract tourist in the first instance.
- 2.19 This document highlighted a number of tourist schemes that had been developed in the Borough, including Carnfunnock County Park and Browns Bay. The reinstatement of the former Gobbins pathway system was also listed as a future scheme proposed by the council.
- 2.20 Three policies in the plan relate directly to tourism, as follows:
- T1 – The Department will protect the tourism resources of Larne Borough comprised in the landscape and the natural and man-made environments from inappropriate forms of development - a Countryside Policy Area was designated to protect landscapes within the AONB and coastal areas from development which was not considered essential.
 - T2 – The Department will normally give favorable consideration to the provision of tourist facilities or tourist accommodation by the sympathetic conversion or appropriate extension of existing buildings and the renovation of vacant buildings.
 - T3 – The Department will require all proposals for tourist development to respect the basic principles of good design and landscaping.

Carrickfergus Area Plan 2001/draft BMAP (2004) in combination with the Planning Appeals Commission Inquiry report

- 2.21 The Carrickfergus Area Plan 2001, was adopted in March 2000 and recognises the value of the Borough's heritage and coastline to tourism. The Tourism Strategy stated that favourable consideration would normally be given to tourist facilities in the settlements of the Borough. In the countryside, proposals for tourism development should not adversely impact on key environmental assets and new development should be kept to a minimum. The Carrickfergus Area Plan also set out that tourism assets within the Borough should be protected from unnecessary, inappropriate and excessive development.

- 2.22 Draft BMAP Strategy and Framework contained a Tourism Strategy which sought to promote a sustainable approach to tourism development, protect a varied range of tourism development opportunities, facilitate the development of tourism infrastructure and enhance the urban environment generally, and in particular “first impression” points at major getaways, and in the city and town centres. It also set out operational policies for the provision of tourism development both in settlements and in the countryside and in relation to the protection of the setting of tourism assets. The plan recognised that the heritage assets of Carrickfergus along with the surrounding countryside and coast offer opportunities for sustainable leisure and tourism development. The plan incorporates a sustainable approach to tourism development that seeks to protect key assets to ensure that new development does not harm the environment, character or cultural heritage of the Plan Area. The Tourism Strategy was subsequently brought forward, however, the operational policies were not as they unnecessarily reiterated protection already afforded under existing regional policy.

Mid and East Antrim Borough Council Corporate Plan 2019-2023

- 2.23 Our Corporate Plan sets out the Council’s vision, themes and objectives that will shape our work and the services that we provide up until 2023. The aim of the Corporate Plan is to deliver the same long term vision and outcomes for the Borough that are set out in the Community Plan. The key objectives of the Plan are identified under five main themes all of which fall under the wider strategic theme to be a high performing council:
- Sustainable jobs and tourism.
 - Good health and wellbeing.
 - Learning for life.
 - Community safety and cohesion.
 - Our environment.
- 2.24 Creating a compelling tourism proposition is one of the key objectives of Council’s Corporate Plan as it is considered that the potential of our tourism product has not been fully realised, and has the promise of delivering greater economic benefit for our area. This will include developing and investing in our unique heritage and assets to attract more visitors to stay longer and spend more. Safeguarding our tourism assets, is of vital importance, and this in turn depends to a large extent on preserving or enhancing landscape quality and the historic and natural environment of Mid and East Antrim.

Mid and East Antrim Borough Council Community Plan

- 2.25 Our Community Plan – ‘Putting People First’ was published in April 2017 and covers the period from 2017 to 2032. The vision of the Community Plan is that: *“Mid and East Antrim will be a strong, safe and inclusive community, where people work together to improve the quality of life for all”*. The strategic priorities set out in the Community Plan have been identified through joint working with 12 statutory partner organisations and informed by extensive consultation with the public and community and stakeholder groups. The strategic priorities are developed around the five key themes that now inform the Corporate Plan.
- 2.26 The Local Government Act (Northern Ireland) 2014 sets out a statutory link between the Community Plan and the LDP, in that the preparation of the LDP must take account of the Community Plan. The strategic priorities of our Community Plan have therefore been taken into consideration in the preparation of the draft Plan Strategy. As work on the LDP progresses, we will seek to deliver on any community planning outcomes where there is an identified spatial land use or local planning policy solution.
- 2.27 Our Community Plan highlights the local challenges in relation to tourism. This includes working to ensure our significant tourism assets are developed, packaged and well marketed to local, national and international visitors. One of the outcomes is for our Borough to be a destination of choice with increased visitor numbers and spend on first-class facilities and attractions.

Mid and East Antrim Borough Council Integrated Economic Development Strategy

- 2.28 Council's Integrated Economic Development Strategy 2018-2030 - 'Amplify' was published in 2018 and its vision is for Mid and East Antrim to become Northern Ireland's leading centre for Advanced Manufacturing and Agri-Food with recognised capabilities in Tourism, Financial and Business Services, and Digital Technologies.

Mid and East Antrim Borough Council Tourism Strategy

- 2.29 Council's emerging Tourism Strategy aims to use the significant potential of the Causeway Coastal Route and the area's natural and historic assets to create a strong tourism brand identity and create a compelling package for attracting visitors. The Causeway Coastal Route is considered to be the main attraction that will draw people to visit Mid and East Antrim, with sites, facilities and businesses across the Borough being aligned to the route, to offer stopping off points, places to stay, places to visit and eat and quality experiences. Diversions from the route will encourage visitors to explore other facilities and attractions across the Borough.

Cross Boundary Policy Context

- 2.30 In developing our Tourism Strategy and policies account has been taken of the local policy context as it relates to the emerging LDP's of our three neighbouring councils:
- **Antrim and Newtownabbey Borough Council;**
 - **Causeway Coast and Glens Borough Council Belfast City Council; and**
 - **Mid Ulster District Council.**
- 2.31 Neighbouring Council's Preferred Options Papers, supporting evidence base and published draft Plan Strategies have been taken account of, as these are regarded as the most relevant documents when considering cross-boundary issues. Because Carrickfergus falls within the Belfast Metropolitan Area, there has also been engagement with Belfast City Council and other councils in the Metropolitan area.

Table 2.1 Neighbouring Councils Position on Tourism

Neighbouring Council	Position
Antrim and Newtownabbey Borough Council	<p>ANBC published its draft Plan Strategy in June 2019. ANBC relevant policies: Strategic Policy 2.15 Sustainable tourism and Policy DM 9 Tourism Development</p> <p>The policy approach is to facilitate the growth of sustainable tourism in a manner that will not damage key tourism assets, such as the shore of Lough Neagh. Policy DM 9 sets out detailed criteria to be met for tourist facilities, tourist accommodation, and major tourism development of exceptional benefit to the Borough's tourism industry and outlines general criteria for tourism development in the Borough.</p>

Causeway Coast and Glens Borough Council	<p>CCGBC published its POP in June 2018. CCGBC relevant preferred option: Key Issue TO1: Increasing Visitor Numbers- Impact on Our Sensitive Landscapes.</p> <p>The POP document recognises that tourism is an important asset for the Borough and accounts for 12% of local employment. However, it is also acknowledged that a coordinated and robust approach to visitor destination management is required. The preferred option to Key Issue TO1 is to seek to protect existing tourism assets and environment while promoting the less well known or visited areas within the Borough.</p>
Mid Ulster District Council	<p>Mid Ulster published its draft Plan Strategy in February 2019. Mid Ulster relevant policies: TOU1 Protection of Tourism Assets and Tourist Accommodation, Policy TOU2 Resort Destination Development, Policy TOU3 Tourism Accommodation and Policy TOU 4 Tourism Facilities/Amenities and Attraction.</p> <p>Mid Ulster hope to develop their tourism industry by promoting appropriate tourism activity at a number of sites and by encouraging visitors to stay in the area and contribute to the wider economy, whilst conserving tourist assets and the environment. To achieve this Tourism Opportunity Zones (along Lough Neagh shoreline, Sperrins AONB at Davagh Forest and Sixtowns Road valley) and Tourism Conservation Zones (Sperrins AONB and near Beaghmore ASAI) have been introduced.</p>

- 2.32 The Council has responded to neighbouring Council's POPs and the draft Plan Strategies for Antrim and Newtownabbey and Mid Ulster as they were published. In addition, the Council is also represented on a number of working groups to discuss cross boundary issues, for example the Metropolitan Area Spatial Working Group and Lough Neagh Forum.
- 2.33 Members of the plan team have also met with officials in the three neighbouring councils during preparation of the POP. In preparation for the draft Plan Strategy, members of the plan team met again in July 2019 with officials in the three neighbouring councils to outline the various broad approaches of the draft Plan Strategy and to discuss cross-boundary issues. During these discussions, the broad approach of the Tourism Strategy was discussed including the Tourism Opportunity Zones and no issues of conflict were raised. It was recognised that it will be particularly important as the LDP process develops for Mid and East Antrim and Causeway Coast and Glens to work closely to both protect and capitalise economically on the tourism potential of the Causeway Coastal Route.
- 2.34 In consideration of neighbouring Councils development plan documents and discussions held with them, it is the opinion of this Council that there is no conflict with our draft Plan Strategy, insofar as it relates to tourism.

3.0 Tourism Profile

Key Assets and Tourism Resources

- 3.1 Natural heritage and historic environment resources are often deemed to be the key players in the ability to generate and attract tourism and associated revenue. The hills, glens, coast and inland waterways of the Borough are important in terms of their rich natural heritage and high quality landscape value. Significant areas and sites are protected by various environmental and landscape designations to ensure retention of these special characteristics, delicate ecosystems and unique biodiversity. The Antrim Coast road is a major tourist attraction of regional significance. Some 65 miles of this road falls within Mid and East Antrim Borough and is a key link on the Causeway Coastal Route between Belfast and Derry/Londonderry, with the Gobbins cliff path being marketed globally as one of NI's most exciting tourist attractions. In addition, a substantial part of the Antrim Coast and Glens AONB is located in Mid and East Antrim. This AONB is dominated by the Antrim Plateau rising to over 500m and cut by fast flowing rivers to form a series of picturesque glens running east and north-east towards the sea. These areas attract tourists and provide opportunities for a wide range of outdoor activities including hiking, fishing and cycling.
- 3.2 The area also has a rich archaeological heritage with standing stones, raths, cairns and monuments distributed across the countryside. The area's cultural and historic environment includes visitor attractions such as Carrickfergus Castle, Andrew Jackson Cottage, the Moravian settlement in Gracehill and the museums in Ballymena, Carrickfergus and Larne towns. The ability of these assets to attract visitors can be enhanced through the hosting of events and activities by Council and other organisations seeking to promote tourism in the area. Position Paper 7 Tourism sets out in greater detail the various key tourism assets and attraction available throughout the Borough.



Tourism Statistics and Performance

3.3 Measuring tourism performance is challenging with no single measure providing a definitive statistic. The latest regional tourism statistics were published in July 2019 by NISRA and relate to the year ending 2018. A tourism profile of Mid and East Antrim district based on these statistics can be demonstrated under the following indicators:

- **Overnight trips (2018)**
- **Expenditure on overnight trips (2018)**
- **Reason for Visit (2016-2018)**
- **Commercial (Tourist) Accommodation (2018)**
- **Visitor Attractions (2018)**
- **Employment in Tourism related industry (2017)**

Overnight Trips and Expenditure

3.4 In 2018, 296,441 overnight trips were made to Mid and East Antrim, a 16% increase from 2017. Reflecting the increase in the number of overnight trips, the expenditure on these trips increased by 17% since 2017 and equated to an estimated spend of £50,670,328 in the Borough. This was the sixth highest number of overnight trips secured and the sixth highest expenditure on overnight trips of all the local government districts.

Table 3.1 Overnight trips and expenditure on overnight trips – 2012-2018

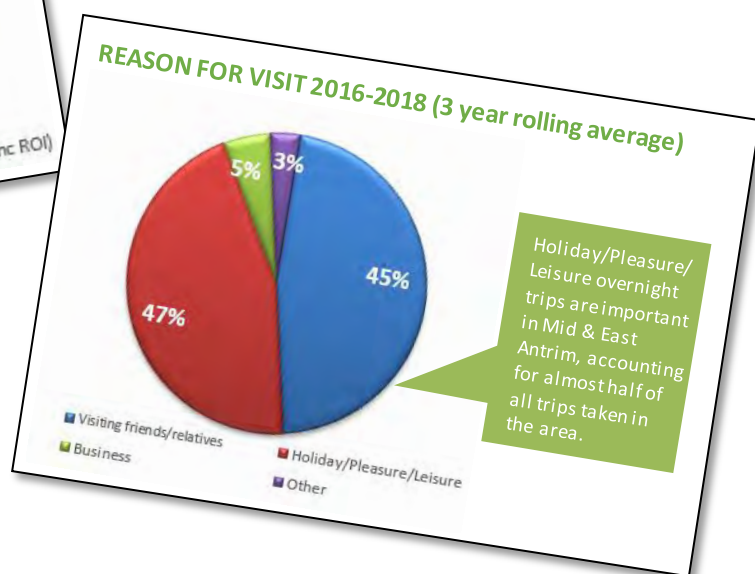
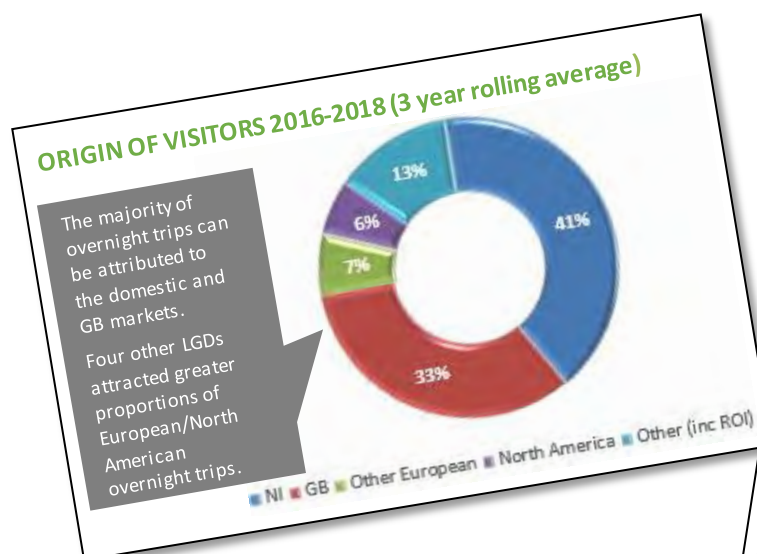
	2012	2013	2014	2015	2016	2017	2018	2018 V 2017	2018 % of NI
Trips	256,076	251,338	322,107	383,861	301,768	255,803	296,441	+16%	6%
Nights	658,168	835,646	1,147,683	1,010,302	1,055,602	964,131	966,916	+0.3%	6%
Spend	£32.8m	£40.5m	£54m	£46m	£46m	£43m	£50.7m	+17%	5%
Average length of stay	2.6	3.3	3.5	2.6	3.5	3.8	3.3		
Average spend per trip	£128	£161	£167	£119	£153	£169	£171		

Source: NISRA Local Government District, Tourism Statistics 2019

Notes: Tourism performance estimates presented above are based on overnight trips made by NI residents and visitors from outside NI. Estimates relate to overnight trips only and excludes day trips


Reason for Visit

- 3.5 The reason for the majority of overnight trips to Mid and East Antrim were for Holiday/Pleasure/Leisure accounting for almost half (47%) of all trips taken in the area. For the first time this overtook visiting friends and relatives as the main reason for visiting the Borough. The majority of overnight trips can be attributed to the domestic and GB markets.



Commercial (Tourist) Accommodation

- 3.6 Mid and East Antrim has the joint fourth highest number of hotels and is fifth out of the 11 local government districts in terms of hotel bed spaces and rooms sold in hotel accommodation. However, the Borough has the highest hotel bed space occupancy (64%) of all the local government districts. Ballymena currently has four hotels in close proximity to the town, with a further two hotels granted approval adjacent to the M2. There are three hotels in Carrickfergus and one in Larne town. A further three hotels are dotted along the Coast Road.
- 3.7 There are now 550 self-catering beds in the Borough an increase of 112 since 2017. Whilst the Borough has the fourth lowest number of guest house/guest accommodation/bed and breakfast bed spaces in all the local government districts, there was a an increase of 76 bed spaces since 2017.
- 3.8 Within the Borough there are currently four touring caravan/motorhome parks, located at Carnfunnock Country Park, Curran Court and Islandmagee. In addition, there are four motorhome service points located at Portglenone Marina, Houston's Mill Broughshane, Carrickfergus Harbour and Bentra Golf course. Campsites are available at three locations in Larne and Islandmagee.

Table 3.2 Commercial (Tourist) Accommodation – 2018


	STOCK			OCCUPANCY	
	Number	Rooms	Beds	Room	Bed-space
Hotels	12	539	1,195	74%	64%
GH/GA/B&B*	63	186	429	41%	35%
Hostel	1	9	51		
Bunkhouse	1	6	36		
Self-catering	Units	Rooms	Beds	Annual	Peak (April-Sep)
	120	276	550	33%	41%
All		1,016	2,261		

Mid & East Antrim has 6% of the available hotel beds in NI, 5% of B&B/Guest house and Guest Accommodation beds and 3% of the available self-catering beds in NI.

Mid & East Antrim has the highest hotel bed-space occupancy of all the LGDs.

Source: NISRA Local Government District, Tourism Statistics 2019

*Guesthouse/guest accommodation/bed & breakfast

Visitor Attractions

- 3.9 NISRA statistics indicate that Carnfunnock Country Park was the most visited attraction in Mid and East Antrim during 2018. The top attraction (excluding parks) was Carrickfergus Castle followed by The Braid Arts Centre and The Gobbins. The restoration of The Gobbins cliff path by Council, complete with visitor centre, café and playground, has created a unique coastal attraction and further improves the visitor experience along the Causeway Coastal Route. It is hoped that the site will become a major tourism asset of regional significance and a strengthening factor for the local economy.
- 3.10 Activity tourism such as angling, hill walking and horse riding have the potential to create important economic benefits particularly in the rural area. The Causeway Coastal Route within the Borough also has potential to attract cyclists as part of the legacy of the Giro d'Italia Grand Depart event in 2014. The Borough also has potential to benefit from the income golf generates in the Northern Ireland economy. Golfers spend considerably more money than regular tourists and Galgorm Castle Golf Club set in the grounds of a prestigious historical estate is one of Ireland's finest Championship courses which hosts the NI Open (now rebranded as the ISPS HANDA World Invitational) annually.
- 3.11 Water sport activities, including those based on the River Bann and along the coast, have important tourist potential and as mentioned under Key Assets above Mid and East Antrim has a number of historic environment assets including Carrickfergus Castle and deep links to Ulster Scots Heritage which are strong incentives towards attracting visitors to the area.



817,911 visits to visitor attractions in Mid & East Antrim in 2018.
(only includes those who took part in survey)

Tourism jobs in Mid & East Antrim increased by 11% since 2015, while non-tourism jobs decreased by 1%

4,395 tourism jobs in Mid & East Antrim LGD – 10% of total employee jobs.



Employment in Tourism related industry

- 3.12 Despite an 11% increase in tourism jobs between 2015 and 2107, employment in the tourism sector in Mid and East Antrim is below the NI average, with the Borough having the fourth lowest number of tourism jobs out of all the local government districts.

4.0 Preferred Options Paper

- 4.1 Council published its Preferred Options Paper (POP) in June 2017. The main purpose of the POP is to inform the next stage in the LDP process, i.e. the Plan Strategy.
- 4.2 Building on the emerging evidence base⁴, the POP identified some 36 key strategic planning issues relevant to Mid and East Antrim, set out alternative options for addressing most of these key issues, and highlighted Council's preferred option. The POP also included an initial policy review of the operational policies contained in the suite of Planning Policy Statements (PPSs) published by the former Department of Environment, now Department for Infrastructure (DfI), also taking account of the Strategic Planning Policy Statement (SPPS).
- 4.3 The POP was subject to 12 weeks public consultation which resulted in 132 responses from members of the public and statutory consultees. A public consultation report on the POP was published by Council in November 2017.
- 4.4 Key Issue 11 of the POP dealt with accommodating future tourism demand and put forward a preferred option to largely retain the current strategic policy approach set out in PPS 16: Tourism and in addition bring forward bespoke policy tailored to the tourism potential of vulnerable, sensitive and opportunity areas within the Borough.
- 4.5 The majority (87%) of public responses supported the preferred option approach in the POP consultation. There was some support to protect vulnerable and sensitive assets and the continued inclusion of PPS 16 policy wording. Others who supported the preferred option also expressed that the LDP should not be too prescriptive. A number of additional areas to be protected and additional opportunity zones were also suggested. Whilst there was support for the identification of the former Magheramorne quarry as an opportunity zone, NIEA raised caution, stressing the need to ensure it is considered in the Habitats Regulations Assessment due to its proximity to Larne Lough. Similarly, Historic Monuments Council highlighted the sensitivity and importance of the Carnfunnock Country Park from a historic perspective and a member of the public stressed that the natural assets within this rural park should be maintained.
- 4.6 In addition to this key issue, the POP included a review of the existing tourism policies and made recommendation as to whether to bring these policies forward with or without amendments (see Appendix B). The public/consultees were also asked for their opinion about proposed amendments to strengthen existing PPS 16 Policy TSM 8 Safeguarding of Tourism Assets.
- 4.7 For full details of the main issues raised by respondents to the POP consultation and Council's consideration, refer to the POP Public Consultation Report November 2017, available at:
https://www.midandeantrim.gov.uk/downloads/POP_Public_Consultation_Report.pdf

⁴ A series of 14 topic based position papers informing the POP, plus our annual housing monitor and bi-annual industrial monitor are available on the Council website.

5.0 Consultee and Councillor Engagement

- 5.1 In order to meet the requirements set out in the Planning Act relating to the need for the Plan Strategy to take account of the RDS, other policy and guidance issued by the DfI and other relevant government strategies and plans; Council has engaged key consultees representing relevant central government departments and agencies. Representatives from relevant Council departments have also been engaged to ensure that due account has been taken of Council's Community Plan, as well as other Council strategies and initiatives. This engagement was undertaken by way of a series of eight 'Project Management Team' meetings held between April 2018 and April 2019 and has had a significant influence on the development of the strategic policies and proposals.
- 5.2 The Planning Act requires the Plan Strategy to be adopted by resolution of the Council, following approval by DfI. Accordingly, elected members have also been engaged in the development of draft Plan Strategy, to ensure that the document is generally aligned with Council's strategic priorities. This engagement was facilitated through a series of six councillor workshops held between November 2018 and March 2019.
- 5.3 The draft Plan Strategy Tourism Strategy and tourism policies were presented at the Project Management Team meeting held on 18 April 2019 and the Councillor workshop held on 11 December 2018. There was general agreement with the proposed approach and minor amendments were made to the strategic subject policies following comments made at or following these meetings (see Appendix B).

6.0 Draft Plan Strategy Policy Approach

- 6.1 As indicated in section 4.0, the POP included a preferred option for accommodating future tourism demand. The approach in the draft Plan Strategy is to bring forward the POP preferred option with minor amendments as follows:

Table 6.1 Amendments to the POP Preferred Option for Key Issue 11

Key Issue	Changes from POP Preferred Option
11	<p>Instead of bringing forward bespoke policy tailored to the tourism potential of vulnerable, sensitive and opportunity areas within the Borough this approach will be delivered in a more strategic way through the Tourism Strategy set out in the draft Plan Strategy (refer to SGS8). This will serve to provide broad direction on the potential opportunities and constraints for tourism development within these three categories. The policy approach proposed within these categories is then given greater definition through the strategic subject policies TOU2 and TOU3. Policy TOU3 All Tourism Development in the Countryside highlights that tourism proposals in Special Countryside Areas and other vulnerable areas (those listed in the Justification and Amplification of SGS8) will only be permitted where they meet the exceptions specified in the LDP policy for the specific designation. Separate strategic proposals and strategic subject policies (such as those in Chapter 5 Countryside Strategy, Chapter 10 Historic Environment and Chapter 11 Natural Heritage) will also help protect locations within the vulnerable and sensitive categories. Policy TOU2 Tourism Development in Settlements and Tourism Opportunity Zones sets out bespoke policy for those locations within the opportunity category.</p> <p>The locational types included under each of the vulnerable, sensitive and opportunity categories have been slightly amended as follows:</p> <ul style="list-style-type: none"> • To take account of our new designations (e.g. Areas of High Scenic Value changes to Areas of Constraint on High Structures). • Moving Gracehill Conservation Area from the vulnerable category to the sensitive category as Conservation Area policy does not differentiate between areas. • Clarifying Sites of Archaeological Interest following discussion with Historic Environment Division. • Moving Historic Parks, Gardens and Demesnes from the vulnerable category to the sensitive category in recognition that sensitive tourism development may be one method to help maintain these assets. • Removing the Gobbins visitor centre/path from the opportunity category as the visitor centre is already with the settlement of Ballystrudder and therefore does not need to be specifically identified as having opportunities for tourism development. Removing the Gobbins path as an identified opportunity zone will avoid targeting specifically tourism development on this vulnerable coastal asset and therefore safeguard its value as a tourist attraction.

- 6.2 These amendments have taken account of points raised through consultee and councillor engagement.
- 6.3 In regard to the comments raised at POP stage about the former Magheramorne Quarry and Carnfunnock Country Park being included as Tourism Opportunity Zones this has been carefully considered in light of the existing planning approval at Magheramorne Quarry and the Council masterplan for Carnfunnock. The policy wording of Policy TOU2 Tourism Development in Settlements and Tourism Opportunity Zones, ensures that the General Policy and other provisions of the LDP (such as Historic Environment and Natural Heritage policies) must also be met. In addition, the policy allows for key site requirements to be introduced where necessary at Local Policies Plan stage.
- 6.4 The above approach, alongside our evidence base and taking into account the regional and local policy context has led to the formulation of strategic proposal SGS8 Tourism Strategy. This provides a spatial framework for the operational subject policies relating to tourism with Part 2 of the draft Plan Strategy.
- 6.5 Appendix B illustrates how the operational tourism policies (TOU1-TOU8) and related Policy GP1 General Policy for all Development have evolved through the outworking of the LDP process to date, including Sustainability Appraisal. It provides the rationale where amendments have been made to the existing planning policies.

7.0 Soundness

- 7.1 The draft Plan Strategy has been prepared so as to take due regard to meeting the tests of soundness as set out in the DfI Development Plan Practice Note 6: Soundness (Version 2, May 2017). The draft Plan Strategy insofar as it relates to the strategic tourism policies and proposals is regarded as sound, because it meets the various tests of soundness as summarised below:

Table 7.1 Consideration of Soundness

Procedural Tests	
P2	The Tourism Strategy and tourism policies have evolved from the POP and POP Public Consultation Report as described in section 4.0 this document.
P3	The Tourism Strategy and tourism policies have been subject to Sustainability Appraisal. Further details are included in the Sustainability Appraisal Report.
Consistency Test	
C1	The Tourism Strategy and tourism policies have taken account of the RDS, particularly RG4. Refer to paragraphs 2.2 - 2.4 of this document.
C2	The Tourism Strategy and tourism policies have taken account of the Community Plan, particularly the Sustainable Jobs and Tourism outcome to ensure our Borough is a destination of choice with increased visitor numbers and spend on first-class facilities and attractions. Refer to paragraphs 2.25 – 2.27 of this document.
C3	The Tourism Strategy and tourism policies have taken account of the SPPS, particularly paragraphs 6.251 – 6.266 relating to tourism. Regard has also been had to PPS 16: Tourism and PPS 21: Sustainable Development in the Countryside and to other relevant government initiatives as detailed in paragraphs 2.5 – 2.12 of this document.
C4	The Tourism Strategy and tourism policies have had regard to the existing development plans within Mid and East Antrim, Council's emerging Tourism Strategy and the emerging proposals of neighbouring councils. Refer to paragraphs 2.13 – 2.34 of this document.
Coherence and the effectiveness tests	
CE1	The Tourism Strategy and tourism policies have taken account of the emerging LDP's of our three neighbouring councils and it is not considered to be in conflict with them. Refer to paragraphs 2.30 – 2.34 of this document.
CE2	The Tourism Strategy and tourism policies are founded on a robust evidence base which includes the baseline information assembled in LDP Position Paper 7, the POP and responses to it, and subsequent consultation with consultees including Council's Tourism, Arts and Cultural Services department and Tourism NI.
CE3	The Monitoring Framework (indicator 17) within Technical Supplement 1 outlines that the number of approvals for tourist amenities and tourist accommodation developments will be monitored, however no target or review trigger has been identified at this stage.
CE4	There will be flexibility for the Local Policies Plan to identify the extent of the two proposed tourism opportunity zones and add key site requirements where necessary. Tourism policies and proposals will be reviewed at Plan Review stage.

APPENDICES

APPENDIX A Tourism Statistics

Table A1 Estimated overnight Trips, Nights and Expenditure - NI and Local Government District – 2018

	Overnight Trips		Nights		Expenditure	
		% of NI		% of NI	(£)	% of NI
Antrim & Newtownabbey	157,228	3%	525,432	3%	27,668,300	3%
Ards & North Down	257,119	5%	1,121,979	7%	45,983,014	5%
Armagh, Banbridge & Craigavon	188,551	4%	704,130	4%	26,404,319	3%
Belfast	1,693,985	33%	5,244,269	32%	395,013,843	41%
Causeway Coast & Glens	1,011,485	20%	3,177,569	19%	172,343,288	18%
Derry & Strabane	334,874	7%	1,025,913	6%	55,433,203	6%
Fermanagh & Omagh	403,904	8%	1,064,561	7%	72,894,905	8%
Lisburn & Castlereagh	189,366	4%	725,493	4%	30,527,274	3%
Mid & East Antrim	296,441	6%	966,916	6%	50,670,328	5%
Mid Ulster	130,088	3%	450,101	3%	21,968,481	2%
Newry, Mourne & Down	449,953	9%	1,289,821	8%	69,345,336	7%
Northern Ireland	5,112,993	100%	16,296,184	100%	968,252,291	100%

Source: NISRA Local Government District, Tourism Statistics 2019

Table A2 Estimated number of Overnight Trips in NI by Local Government District - 2013-2018

	2013		2014		2015		2016		2017		2018	
		% of NI		% of NI		% of NI		% of NI		% of NI		% of NI
Antrim & Newtownabbey	234,055	6%	200,582	4%	204,902	4%	217,755	5%	205,611	4%	157,228	3%
Ards & North Down	342,388	8%	443,481	10%	378,254	8%	283,142	6%	282,323	6%	257,119	5%
Armagh, Banbridge & Craigavon	201,161	5%	231,852	5%	149,782	3%	144,952	3%	228,595	5%	188,551	4%
Belfast	1,123,126	27%	1,166,907	25%	1,364,115	29%	1,459,407	31%	1,482,343	30%	1,693,985	33%
Causeway Coast & Glens	703,896	17%	756,966	16%	916,063	20%	809,405	17%	1,063,989	21%	1,011,485	20%
Derry & Strabane	254,121	6%	231,027	5%	223,718	5%	282,833	6%	270,408	5%	334,874	7%
Fermanagh & Omagh	364,245	9%	388,235	8%	342,741	7%	304,855	6%	342,847	7%	403,904	8%
Lisburn & Castlereagh	123,669	3%	117,661	3%	131,121	3%	169,863	4%	150,837	3%	189,366	4%
Mid & East Antrim	251,140	6%	322,198	7%	383,861	8%	301,655	6%	255,803	5%	296,441	6%
Mid Ulster	141,122	3%	213,795	5%	156,252	3%	178,480	4%	136,626	3%	130,088	3%
Newry, Mourne & Down	452,567	11%	571,238	12%	406,302	9%	571,054	12%	589,581	12%	449,953	9%
Northern Ireland	4,191,491	100%	4,643,943	100%	4,657,109	100%	4,723,402	100%	5,008,962	100%	5,112,993	100%

Source: NISRA Local Government District, Tourism Statistics 2019

Table A3 Estimated average Overnight Trips in NI by Reason for Visit and Local Government District - 2016-2018
(3 year average)

	Holiday/Pleasure/ Leisure (HPL)			Visiting Friends and Relatives (VFR)			Business			Other			All		
		% HPL	% LGD		% VFR	% LGD		% Business	% LGD		% Other	% LGD		% NI	% LGD
Antrim & Newtownabbey	47,301	2%	24%	106,302	6%	55%	28,180	7%	15%	11,748	9%	6%	193,531	4%	100%
Ards & North Down	89,631	4%	33%	160,280	8%	58%	15,003	4%	5%	9,281	7%	3%	274,195	6%	100%
Armagh, Banbridge & Craigavon	35,083	1%	19%	133,491	7%	71%	14,427	3%	8%	4,365	3%	2%	187,366	4%	100%
Belfast	729,188	29%	47%	539,775	28%	35%	230,878	54%	15%	45,405	36%	3%	1,545,245	31%	100%
Causeway Coast & Glens	727,529	29%	76%	194,138	10%	20%	29,961	7%	3%	9,998	8%	1%	961,626	19%	100%
Derry & Strabane	105,560	4%	36%	151,154	8%	51%	26,622	6%	9%	12,703	10%	4%	296,038	6%	100%
Fermanagh & Omagh	195,976	8%	56%	124,986	7%	36%	24,423	6%	7%	5,149	4%	1%	350,535	7%	100%
Lisburn & Castlereagh	42,793	2%	25%	108,302	6%	64%	14,946	4%	9%	3,981	3%	2%	170,022	3%	100%
Mid & East Antrim	132,823	5%	47%	127,986	7%	45%	14,575	3%	5%	9,249	7%	3%	284,633	6%	100%
Mid Ulster	38,286	2%	26%	100,486	5%	68%	8,637	2%	6%	989	1%	1%	148,398	3%	100%
Newry, Mourne & Down	353,870	14%	66%	149,806	8%	28%	18,626	4%	3%	14,561	11%	3%	536,863	11%	100%
Northern Ireland	2,498,040	100%	50%	1,896,706	100%	38%	426,279	100%	9%	127,428	100%	3%	4,948,453	100%	100%

Source: NISRA Local Government District, Tourism Statistics 2019

Table A4 Accommodation Stock in Mid and East Antrim – 2018

Accommodation Type		Mid and East Antrim
Hotels	Number	12
	Rooms	539
	Beds	1,195
Guesthouses	Number	2
	Rooms	6
	Beds	13
Bed and Breakfasts	Number	55
	Rooms	159
	Beds	369
Hostels	Number	1
	Rooms	9
	Beds	51
Self-Catering Units	Number	94
	Units	120
	Rooms	276
	Beds	550
Guest Accommodation	Number	6
	Rooms	21
	Beds	47
Bunk House	Number	1
	Rooms	6
	Beds	36
All	Number	171
	Rooms	1,016
	Beds	2,261

Source: NISRA Local Government District, Tourism Statistics 2019

Table A5 Hotel Occupancy Rates by Local Government District - 2014-2018

	2014		2015		2016		2017		2018	
	Room Occupancy	Bed-Space Occupancy	Room Occupancy	Bed-Space Occupancy	Room Occupancy	Bed-Space Occupancy	Room Occupancy	Bed-Space Occupancy	Room Occupancy	Bed-Space Occupancy
Antrim & Newtownabbey	58%	41%	61%	44%	64%	45%	69%	48%	66%	46%
Ards & North Down	56%	44%	54%	44%	61%	54%	63%	54%	*	*
Armagh, Banbridge & Craigavon	56%	38%	55%	37%	52%	38%	58%	38%	65%	38%
Belfast	74%	51%	77%	60%	79%	64%	80%	63%	74%	58%
Causeway Coast & Glens	59%	39%	59%	38%	64%	40%	67%	45%	67%	45%
Derry & Strabane	60%	46%	59%	47%	65%	50%	70%	54%	68%	53%
Fermanagh & Omagh	59%	49%	59%	49%	63%	52%	68%	56%	64%	53%
Lisburn & Castlereagh	*	*	*	*	*	*	*	*	*	*
Mid & East Antrim	62%	49%	64%	51%	67%	54%	73%	63%	74%	64%
Mid Ulster	47%	33%	48%	37%	54%	42%	56%	42%	55%	36%
Newry, Mourne & Down	52%	40%	55%	43%	62%	48%	64%	49%	60%	45%
Northern Ireland	65%	46%	67%	50%	70%	54%	73%	56%	70%	53%

Source: NISRA Local Government District, Tourism Statistics 2019

Table A7 Breakdown of tourism Jobs in Mid and East Antrim - 2015-2017

		<i>Accommodation for Visitors</i>	<i>Food and Beverage serving activities</i>	<i>Transport</i>	<i>Sporting and recreational activities</i>	<i>Other</i>	Total Tourism Jobs	Total Non- Tourism	Total Jobs
2015	Antrim & Newtownabbey	593	2,173	897	444	90	4,197	51,740	55,937
	Ards & North Down	534	3,208	81	573	558	4,954	33,228	38,182
	Armagh, Banbridge & Craigavon	440	2,615	233	712	266	4,266	65,835	70,101
	Belfast	2,697	11,178	1,314	1,695	1,723	18,607	201,583	220,190
	Causeway Coast & Glens	1169	2,605	266	620	163	4,823	34,729	39,552
	Derry & Strabane	716	2,698	154	779	338	4,685	48,945	53,630
	Fermanagh & Omagh	1,032	1,579	135	426	352	3,524	35,902	39,426
	Lisburn & Castlereagh	329	2,501	113	719	144	3,806	50,286	54,092
	Mid & East Antrim	1023	2,135	240	425	136	3,959	39,539	43,498
	Mid Ulster	663	2,000	213	512	101	3,489	46,667	50,156
	Newry, Mourne & Down	1037	2,845	117	599	355	4,953	47,388	52,341
	Northern Ireland	10,233	35,537	3,763	7,504	4,226	61,263	655,842	717,105
2017	Antrim & Newtownabbey	712	2436	928	408	75	4,560	55,187	59,747
	Ards & North Down	465	3452	112	584	542	5,155	33,591	38,746
	Armagh, Banbridge & Craigavon	476	2951	258	793	254	4,731	69,136	73,868
	Belfast	2758	11554	1573	1436	1905	19,226	204,872	224,098
	Causeway Coast & Glens	1203	2935	254	429	185	5,006	35,550	40,556
	Derry & Strabane	712	2772	141	833	313	4,770	51,051	55,821
	Fermanagh & Omagh	1144	1843	125	372	356	3,841	37,923	41,764
	Lisburn & Castlereagh	315	2826	90	757	191	4,179	51,848	56,027
	Mid & East Antrim	1141	2468	248	374	165	4,395	39,094	43,490
	Mid Ulster	619	2029	240	522	132	3,542	50,714	54,256
	Newry, Mourne & Down	1003	3181	74	764	429	5,451	50,633	56,084
	Northern Ireland	10,548	38,445	4,043	7,274	4,546	64,856	679,600	744,456
Change 2015-2017	Antrim & Newtownabbey	20%	12%	3%	-8%	-16%	9%	7%	7%
	Ards & North Down	-13%	8%	38%	2%	-3%	4%	1%	1%
	Armagh, Banbridge & Craigavon	8%	13%	11%	11%	-5%	11%	5%	5%
	Belfast	2%	3%	20%	-15%	11%	3%	2%	2%
	Causeway Coast & Glens	3%	13%	-4%	-31%	13%	4%	2%	3%
	Derry & Strabane	-1%	3%	-9%	7%	-7%	2%	4%	4%
	Fermanagh & Omagh	11%	17%	-7%	-13%	1%	9%	6%	6%
	Lisburn & Castlereagh	-4%	13%	-20%	5%	33%	10%	3%	4%
	Mid & East Antrim	12%	16%	3%	-12%	21%	11%	-1%	0%
	Mid Ulster	-7%	1%	13%	2%	31%	2%	9%	8%
	Newry, Mourne & Down	-3%	12%	-37%	28%	21%	10%	7%	7%
	Northern Ireland	3%	8%	7%	-3%	8%	6%	4%	4%

Source: NISRA Local Government District, Tourism Statistics 2019

APPENDIX B Evolution of relevant draft Plan Strategy policy (General Policy and Tourism policies TOU1-TOU8)

Current Operational Policy

PPS 1: General Principles	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
<p>Paragraph 3 - The public interest requires that all development is carried out in a way that would not cause demonstrable harm to interests of acknowledged importance.</p>	<p>Under the SPPS, the guiding principle for planning authorities in determining planning applications is that sustainable development should be permitted, having regard to the development plan and all other material considerations, unless the proposed development will cause demonstrable harm to interests of acknowledged importance.</p> <p>The SPPS provides five core planning principles as well as strategic policy under 16 overarching subject matters. Across these principles and policies there are a number objectives such as good design and protecting amenity that apply to all development types.</p>	<p>It was recognised in the POP that there were a number of overlapping criteria across the various policies therefore it was suggested that these may be included within a General Policy in order to prevent duplication.</p> <p>It is recommended that consideration is given to bringing forward a General Policy in the LDP Plan Strategy.</p>	<p>No definitive comments received either for or against the inclusion of a General Policy.</p> <p>Post consultation consideration It is recommended that consideration is given to bringing forward a General Policy in the LDP Plan Strategy.</p>	<p>Policy GP1: General Policy for all Development</p> <p>New policy wording developed following the amalgamation of general policy criteria from across a number of existing policies such as PPS 3 AMP 1 and AMP 6, PPS 4 PED 9, PPS 7 QD1, PPS 16 TSM 7, PPS21 CTY 13, 14 &15, PPS 18 RE 2 as well as policies DES 2 and DES 10 in the PSRNI. The policy also takes account of planning principles included within PPS 12 and PPS 13.</p> <p>The proposed General Policy seeks to ensure that all development (except minor proposals) is sustainable, accords with the LDP and will not result in demonstrable harm to interests of acknowledge importance. This policy also provides operational policy for specific forms of development e.g. schools, which are not specifically catered for through other subject policies.</p> <p>The General Policy sets out criteria under five headings that all development (except minor proposals) must meet, where relevant. Development within the countryside must also meet a number of additional criteria which are particularly relevant to the rural context.</p> <p>Councillor & PMT Comments Some of the original policy criteria have been amended to take account of comments raised through Councillor workshops and meetings with consultees. However, this engagement did not change the overall shape or thrust of the General Policy.</p>

PPS 16: Tourism	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
<p>Policy TSM 1: Tourism Development in Settlements</p> <p>This policy sets out a general presumption in favour of tourism development in settlements whilst ensuring the development respects the site context, in terms of scale, size and design.</p>	<p>The aim of facilitating tourism development is mirrored in the SPPS but is further simplified to state that there will be a general presumption in favour of tourism development within settlements, subject to meeting normal planning requirements.</p>	<p>Policy TSM 1 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p>It is recommended that the wording of Policy TSM 1 is brought forward in the LDP Plan Strategy.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>	<p>Policy TSM 1: Tourism Development in Settlements and Tourism Opportunity Zones</p> <p>The wording of TSM 1 has been largely carried forward, with those parts covered in Policy GP1: General Policy for all Development removed and direction given to this overarching new policy. In addition, this policy will also apply within the designated Tourism Opportunity Zones at Carnfunnock Country Park and at the former Magheramorne Quarry, subject to meeting any key site requirements that may be introduced at LPP stage.</p> <p>Councillor & PMT Comments No changes further to above consultations.</p>
<p>Policy TSM 2: Tourist Amenities in the Countryside</p> <p>Focuses exclusively on tourist amenities (defined as an amenity, facility or service provide primarily for tourists but does not include tourist accommodation) in the countryside. The policy covers, 'new proposals' and 'extension of an existing tourist amenity'. Generally the policy is permissively worded to allow for a range of tourist amenities in the countryside. New development will be permitted provided there is locational need or the type of tourist activity requires a rural location. In both cases where buildings are required the scheme should utilise existing buildings or make provision of replacement buildings.</p> <p>Development of regional importance must demonstrate substantial benefits to the locality and it must be supported by a tourism benefit statement.</p> <p>Also refers to an extension of an existing tourist amenity and permits extensions</p>	<p>SPPS requires a balance between the need to facilitate tourist developments in the countryside and safeguarding the environment.</p> <p>SPPS stipulates that all tourism development in the countryside must be carefully managed in the interests of rural amenity however the guiding principle is that appropriate tourism development should be facilitated where it supports rural communities and promotes a healthy rural economy. This principle covers both the creation of new, and the expansion of existing, tourist development.</p>	<p>Policy TSM 2 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>Key Issue 11, deals with Accommodating Future Tourism Demand. The preferred option is to retain current policy in PPS 16: Tourism <i>and</i> bring forward bespoke policy tailored to the tourism potential of Vulnerable, Sensitive and Opportunity areas within the Borough, which would be identified through the LDP.</p> <p>By taking this approach it could potentially restrict tourist amenities in certain vulnerable/sensitive countryside locations and increase opportunities in identified Tourism Opportunity Zones in the countryside.</p> <p>It is recommended that the wording of Policy TSM 2 is brought forward in the LDP Plan Strategy for the remainder of the countryside.</p>	<p>See Key Issue 11 for statutory consultees and public responses.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>	<p>Policy TSM 2: Tourist Amenities in the Countryside</p> <p>The wording of TSM 2 has been largely carried forward and slightly amended to refer to compliance with Policy TSM 2: All Tourism Development in the Countryside. Policy TSM 2 states that proposals in Special Countryside Areas and other Vulnerable Areas will also have to meet one of the exceptions provided through the policies relating to the particular designation.</p> <p>Councillor & PMT Comments No changes further to above consultations.</p>

provided their scale and nature do not harm rural character. Reuse of existing buildings is promoted. If it is demonstrated that this is not a feasible option new buildings will be considered and these should integrate with the overall development.

Policy TSM 3: Hotels, Guest Houses and Tourist Hostels in the Countryside

States that new or replacement hotels, guest houses and hostels will be permitted in the countryside in 2 circumstances: (i) replacement of an existing rural building or (ii) a new build proposal on the periphery of a settlement. Criteria are set out for each circumstance e.g. buildings to be replaced must be of permanent construction, be of suitable size and must not be listed, and vernacular buildings to be replaced have to demonstrate that they are not capable of being made structurally sound.

Proposals for a new build facility on the periphery of a settlement must demonstrate that there is no suitable site within the settlement or nearby settlement and demonstrate that there are no existing opportunities in the locality either through the conversion and re-use of a suitable building or replacement of a suitable building.

The development must not dominate or adversely affect the landscape setting of the settlement or otherwise contribute to urban sprawl. A sequential location test is also set out.

Applications for change of use or replacement of tourist accommodation approved under this policy have to demonstrate that it is no longer viable long term and that sufficient local alternative provision offsets the loss of tourism benefit.

SPPS contains a similar principle delivered in a more concise manner and states where there is no suitable site within a settlement a new build hotel, guest house, or tourist hostel may be appropriate on the periphery of a settlement subject to meeting the normal planning requirements.

Policy TSM 3 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

Key Issue 11, deals with Accommodating Future Tourism Demand. The preferred option is to retain current policy in PPS 16: Tourism *and* bring forward bespoke policy tailored to the tourism potential of Vulnerable, Sensitive and Opportunity areas within the Borough, which would be identified through the LDP.

By taking this approach it could potentially restrict hotels, guest houses and hostels in certain vulnerable/sensitive countryside locations and increase opportunities in identified Tourism Opportunity Zones in the countryside.

It is recommended that the wording of Policy TSM 3 is brought forward in the LDP Plan Strategy for the remainder of the countryside.

See Key Issue 11 for statutory consultees and public responses.

Post consultation consideration

Bring forward POP recommendation.

Policy TOU5: Hotels, Guest Houses and Tourist Hostels in the Countryside

This policy wording has largely been brought forward from TSM 3 and includes the two circumstances where new/replacement buildings will be permitted. In addition, it includes a third circumstance allowing for the conversion and re-use of an existing rural building to a hotel, guest house or tourist hostel. This was previously set out in PPS21 Policy CTY4. The new policy also refers to compliance with Policy TOU3: All Tourism Development in the Countryside. Policy TOU3 states that proposals in Special Countryside Areas and other Vulnerable Areas will also have to meet one of the exceptions provided through the policies relating to the particular designation.

Councillor & PMT Comments

No changes further to above consultations.

Policy TSM 4: Major Tourism Development in the Countryside – Exceptional Circumstances

States major tourism development will be permitted in the countryside only in exceptional circumstances, 3 tests have to be demonstrated –: exceptional benefit to the tourism industry, a site specific reason for the choice of site and sustainable benefit to the locality.

SPPS advises that the LDP can include policies for major tourism development in the countryside but such proposals must meet the same tests as set out in Policy TSM 4.

Policy TSM 4 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

It is recommended that the wording of Policy TSM 4 is brought forward in the LDP Plan Strategy and the amplification text amended to relate to the new NI Tourism Strategy (when published), rather than the Tourism 'Priorities for Action' Plan.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation.

Policy TSM 4: Major Tourism Development in the Countryside – Exceptional Circumstances

This policy wording has largely been brought forward from TSM 4, with an amendment to refer to Policy TSM 4: All Tourism Development in the Countryside. Policy TSM 4 states that proposals in Special Countryside Areas and other Vulnerable Areas will also have to meet one of the exceptions provided through the policies relating to the particular designation.

Councillor & PMT Comments

Further to comments from HED criteria (a) has been amended to clarify the need to demonstrate exceptional benefit to the regional tourism industry.

Policy TSM 5: Self-Catering Accommodation in the Countryside

Such accommodation is permitted in 3 circumstances: (i) units within hotel, self-catering complex, guest house or holiday park; (ii) 3 or more close to tourist amenity and (iii) the restoration of a clachan. Units should be subsidiary in scale and ancillary to the primary tourism use.

Refers to the conditions that will be placed on all permissions for this type of proposal.

SPPS states the importance of allowing self-catering accommodation, particularly in areas where tourist amenities and accommodation have become established or likely to be provided as a result of tourism initiatives, such as the Signature Projects.

Policy TSM 5 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

Key Issue 11 deals with Accommodating Future Tourism Demand. The preferred option is to retain current policy in PPS 16: Tourism *and* bring forward bespoke policy tailored to the tourism potential of Vulnerable, Sensitive and Opportunity areas within the Borough, which would be identified through the LDP.

By taking this approach it could potentially restrict self-catering accommodation in certain vulnerable/sensitive countryside locations and increase opportunities in identified Tourism Opportunity Zones in the countryside.

It is recommended that the wording of Policy TSM 5 is brought forward in the LDP Plan Strategy for the remainder of the countryside.

See Key Issue 11 for statutory consultees and public responses.

Post consultation consideration
Bring forward POP recommendation.

Policy TSM 5: Self-Catering Accommodation in the Countryside

This policy wording has largely been brought forward from TSM 5 and amended to refer to Policy TSM 5: All Tourism Development in the Countryside. Policy TSM 5 states that proposals in Special Countryside Areas and other Vulnerable Areas will also have to meet one of the exceptions provided through the policies relating to the particular designation.

Councillor & PMT Comments

Further to feedback from HED the restoration of an existing clachan has been removed as one of the circumstances that would permit self-catering accommodation in the countryside.

<p>Policy TSM 6: New and Extended Holiday Parks in the Countryside</p> <p>States that a new holiday park or an extension to an existing facility will be granted where it is demonstrated that the proposal will create a high quality and sustainable form of tourism development. Proposals must be accompanied by a layout and a landscaping plan and meet 7 specific criteria.</p>	<p>SPPS requires new or extended holiday parks to be of a high quality and a sustainable form of tourism development.</p>	<p>Policy TSM 6 appears to be working well and there is no evidence to suggest that it need to be substantially amended.</p> <p>Key Issue 11 deals with Accommodating Future Tourism Demand. The preferred option is to retain current policy in PPS 16: Tourism <i>and</i> bring forward bespoke policy tailored to the tourism potential of Vulnerable, Sensitive and Opportunity areas within the Borough, which would be identified through the LDP.</p> <p>By taking this approach it could potentially restrict new/or extensions to holiday parks in certain vulnerable/sensitive countryside locations and increase opportunities in identified Tourism Opportunity Zones in the countryside.</p> <p>It is recommended that the wording of Policy TSM 6 is brought forward in the LDP Plan Strategy for the remainder of the countryside.</p>	<p>See Key Issue 11 for statutory consultees and public responses.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>	<p>Policy TOUT7: New and Extended Holiday Parks in the Countryside</p> <p>This policy wording has largely been brought forward from TSM 6 and amended to refer to Policy TOUT3: All Tourism Development in the Countryside. Policy TOUT3 states that proposals in Special Countryside Areas and other Vulnerable Areas will also have to meet one of the exceptions provided through the policies relating to the particular designation.</p> <p>Councillor & PMT Comments No changes further to above consultations.</p>
<p>Policy TSM 7: Criteria for Tourism Development</p> <p>Sets out design and general criteria that apply to all forms of tourism development e.g. appropriate design and layout solutions, appropriate boundary treatments, compatibility with surrounding land uses, and infrastructure necessary to accompany the proposal.</p>	<p>Due to the strategic nature of the SPPS it does not specify the criteria listed within Policy TSM 7. SPPS states that all tourism development must be of appropriate nature and scale and design of the specific proposal must be appropriate to the site context.</p>	<p>Policy TSM 7 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p>It is recommended that the wording of Policy TSM 7 is brought forward in the LDP Plan Strategy.</p> <p>Alternatively, the criteria listed in Policy TSM 7 could form part of an overall general policy in the LDP as they are relevant to other types of development.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>	<p>Policy GP1: General Policy for all Development</p> <p>The criteria set out in TSM 7 have been incorporated into Policy GP1: General Policy for all Development (see above).</p>
<p>Policy TSM 8: Safeguarding of Tourism Assets</p> <p>States that permission will not be granted for development that would in itself or in combination with existing and approved development in the locality have an adverse impact on a tourism asset such as to significantly compromise its tourism value.</p>	<p>SPPS recognises that there are many diverse features of built and natural heritage that can be regarded as tourism assets. It also repeats the wording of Policy TSM 8.</p>	<p>Feedback from consultees indicates that Policy TSM 8 is generally sound and provides the detail to the thrust of the SPPS. However, 'tourism value' on its own has proven difficult to quantify at recent planning appeals.</p> <p>It is recommended that the wording of Policy TSM 8 is expanded to state that development should not have adverse impact on a tourism asset such as to significantly compromise its amenity, setting and tourism value.</p>	<p>HED recommend the wording should be amended to include reference to the historic environment.</p> <p>Post consultation consideration It is considered that the proposed amendments are sufficient to protect historic tourism assets, alongside existing archaeology and built heritage policies.</p> <p>Bring forward POP recommendation.</p>	<p>Policy TOUT1: Safeguarding Tourism Assets</p> <p>This policy was largely carried forward from Policy TSM 8, but the additional words 'amenity and setting' have been added to strengthen the policy.</p> <p>Councillor & PMT Comments No changes further to above consultations.</p>

Appendix 1: Glossary of Terms				All relevant terms brought forward within the Plan Strategy Glossary.
Appendix 2: Information Requirements				Appendix not brought forward.
Appendix 3: Tourism Amenities in the Countryside				Appendix B: Tourist Amenities in the Countryside – Sustainability Assessment. Appendix brought forward.
Appendix 4: Landscape Design Consideration for Holiday Parks				Appendix C: Landscape Design Consideration for Holiday Parks Appendix brought forward.
New Policy TOU 3: All Tourism Development in the Countryside				<p>Policy TOU3: All Tourism Development in the Countryside New policy wording developed.</p> <p>Applies to all tourism development in the countryside, and sets out that all proposals must meet Policy GP1: General Policy for all Development and accord with other provisions of the LDP. Differentiates between areas in the countryside inside and outside Special Countryside Areas and other Vulnerable Areas. Inside such areas tourism proposals must meet the exceptions in the LDP for the particular designation in addition to the relevant tourism policy/policies and outside such areas they must meet the requirements of the relevant tourism policy/policies.</p> <p>Councillor & PMT Comments No changes further to above consultations.</p>

A Planning Strategy for Rural Northern Ireland	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
Tourism			(see Chapter 6)	
<p>Policy TOU 5: Advance Direction Signs</p> <p>Sets out that signs directing visitors to tourist attractions will generally be permitted, subject to amenity and safety criteria. Advises that further guidance is available from Roads Service.</p>	SPPS is silent on advance direction signs.	It is recommended that this policy is removed as such signs are regulated by Transport NI (formerly Roads Service).	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration As per POP recommendation do not bring forward wording of Policy TOU 5.</p>	As per POP recommendation policy has not been brought forward.



**Mid & East
Antrim**
Borough Council

Local Development Plan Team
County Hall
182 Galgorm Road
Ballymena
BT42 1QF

Tel: 0300 124 5000
planning@midandeantrim.gov.uk

www.midandeantrim.gov.uk/planning