

154 Ballyrobert Road,
Ballyclare.
BT399RT
19th Setember 2019

Dear Senior Planner, Newtownabbey and Antrim Council,

**The following is my response to
the recent Local Development Plan 2030.**

1. I welcome the plan which is long overdue. However, in the mean time many poor planning decisions have been made and poor developments have occurred. For instance, the very recent agreement to proceed with a major housing development in Doagh and several years ago the decisions to proceed with three housing developments in Ballyrobert village. I will reference these later.
2. The planning approach that has been taking place for many years is not planning but a most basic approach to designating areas of land for a purpose. This is why we now have mile long cul de sacs, little use of public transport, virtually no space for children to play near their homes and a dearth of trees. Today I measured the distance for the entry and exit journey at Wesleydale, Ballyrobert and it was three quarters of a mile. This is absurd to say the least. Within these cul da sacs there is no space for children's play, no trees other than a few in gardens, no footpath in places and no access for public transport. How can disabled, older people and the young cope in these circumstances. It is grotesquely inefficient and sadly this type of situation is happening at other developments. Planning therefore needs to be undertaken in an holistic manner where all material issues are considered in a collective manner with the aim of achieving quality in planning.
3. I have included point 2 to acknowledge the range of the proposals/actions included in the plan that if implemented properly and with quality in mind should address these needs. The use of planning agreements and developer contributions should have been in place half a century ago when these were already in place elsewhere in the UK. The NPFA led the field in this regard and is a disgrace that they were never implemented here. I suspect some developers will resist such arrangements but if every one is treated equally that should not be an issue.
4. I also welcome the proposals on connectivity. But, as previously stated will these be implemented with rigour and quality. The experience on recent developments indicates a very definite not. For instance, the Ollar development at Ballyclare made **NO** links to the Ballyrobert Road despite the fact that this scale of development would make a significant impact on this area. The planners should have stipulated that arrangements be put in place to ensure connectivity with the immediate surrounds and this to include Ballclare and Ballyrobert. To be specific, how can anyone on a bicycle or by walking make their way safely to Ballyrobert Village or to local church at Ballylinney or wait for a bus? This type of planning is disgraceful and lamentable. Grand plans are fine if implemented properly.
5. On a similar theme to point 4, the issue of moving people other than by car needs to be addressed properly. Whilst the plan makes reference to this issue and the policies and proposals are helpful, it is very disappointing that these are not far more specific and objective led. Why is it not possible to do this, at a time when roads with free

moving traffic only a few years ago are now heavily used by cars and vans in particular.

Similarly, when traffic amounts increase substantially, the level of inefficiency of the area and the province increases. Pollution and damage to the environment increases and there is a negative climate change reaction. The planners in the area in recent years have added to this problem by allowing commercial developments along main roads causing them to hinder traffic movement. For instance, consider the developments along the main road from Templepatrick to Ballyclare. One has to ask the question, do any of these commercial enterprises need a main road frontage and the answer is no, but why is it allowed? I suggest this whole aspect of the efficiency of planning be dealt with thoroughly under resiliency.

6. Continuing with the subject of connectivity the references to cycling are most welcome. However as before the current situation is extremely poor with virtually no cycle ways developed or in use throughout the borough. There is some provision for casual cycling but this makes little impact on using cycling as a means of transport to improve efficiency and reducing the damage created by other means of transport. The approach taken in the plan is a 'good idea' but there is no sense of objectivity. I suggest a proposal should state that 'by a certain date every house hold in the borough will have access to a cycle way no further away than 400 m from their home'.
7. The borough is heavily littered and much of the litter is of plastic. Plastic in particular is having a devastating impact from being an eyesore to causing damage to infrastructure and wildlife. There is also an enormous economic cost. This subject should also be included in the resiliency section because the cost to the council, the province's economy and the environment are huge. There is no doubt the planners could do far more. For instance, there should be a proposal to say that planners will develop a policy on how planning could help reduce the impact of litter/waste on the economy and environment of the area. Several approaches used elsewhere are to attach planning conditions that state carry out businesses must only use/sell materials that are truly biodegradable and that bins are provided in and outside their premises and are emptied each day. Likewise, private developments and commercial premises must put in place arrangements to ensure litter and waste is cleared every three days.
8. The economic well being of the area and the province is a major concern and is widely acknowledged by many to be very poor. It is disappointing that the plan rarely addresses this issue yet planning can make a major impact. The planning document could highlight far more the importance of making this a high quality and visually attractive area and one which is environmentally sustainable.
 - a. The most attractive area in the borough is the Six Mile valley and this attractiveness is coupled with a very rich history both industrially and culturally. A major part of creating a formal Six Mile Valley Park is already in place at the lower reaches of the area extending from Lough Neagh through to Muckamore. This could easily be added to and to include walkways, etc all the way to Ballynure. The park should be designated a strategic landscape policy area and by doing so would become a place for tourism and also for people to live. This type of policy exists elsewhere in areas such as Cork which has created an area to

attract high quality investment and but also to attract the skills needed to support high quality business.

- b. Planners need to develop proposals around the impact any development would have on the attractiveness of the borough and in particular at sensitive areas. For instance, the poor siting of safety barriers along our roads and similar barriers at bridges could be easily dealt with but there seems to be no consciousness of the presence of these eyesores and the need to avoid these types of situations.
 - c. The lack of sculpture provided by developers is a major short coming. As happens elsewhere planners/planning policy could arrange for contributions to be made for this type of provision.
 - d. The borough is awash with houses and businesses backing on to roads frontages and these are often accompanied by wooden fences. For instance, I counted 81 houses that fell into this category on one road at Whiteabbey!!
Planners and planning policy needs to have a sense of design quality and I suggest a liking for the natural environment. Walls and wooden fences do little for the environment and often create areas that are unsafe.
The plan makes reference to quality in design but seems to be on the basis of wishful thinking.
9. The plan's proposal for developers to provide open space is very welcome but long over due. It is essential this space is child orientated to allow for informal play in safe surroundings. Developments need to be designed to ensure this happens as opposed to the current arrangement which is provide something on unusable space. It is important that developers are not allowed to opt out of this provision but to insist on quality in design and provision.
This type of proposal is long over due and is a disgrace that this type of arrangement is not in place especially when it is common place elsewhere in the UK.
10. I find it amazing that there is virtually no reference in the plan to the Six Mile Water or other rivers including loughs. This is at a time when water and the provision of quality water world wide including here is a huge concern. The recent WFD assessment of the quality of water in rivers makes for alarming reading. I suggest that a proposal must be prepared to state that a water quality impact assessment must accompany all planning applications. I am involved in angling and the level of pollution of streams and waterways is very significant. Importantly much of this could be avoided had there been proper planning controls in place. For instance, why are some farmers allowed to build sheds etc. for cattle without planning permission which in effect often allows effluent to enter streams and waterways. Likewise, why are businesses allowed to have premises built without planning controls for storage of chemicals and disposal of washings?
11. It is very disappointing that the section dealing with farm buildings is exceedingly sparse. There is no reason why farmers should be treated differently from other businesses. Invariably the buildings are of poor design, rarely fitted into the landscape and virtually never landscaped. This is just downright appalling and this is stated in the context that the public purse pays in the region 80% of farmers' income; and this is done to ensure that they farm responsibly. Thankfully not all farmers fall into this situation but this plan needs to develop quality planning proposals that need to be adhered to by all farmers.

12. Throughout the borough there is a situation of huge areas of dereliction where there was previously shopping facilities eg Abbey Centre and centre of Antrim Town. Meanwhile planning is allowing alternative shopping provision along road ways, at the fringe of towns and villages. At the same time the heart is being torn out of towns and villages. This is a major issue UK wide and government in UK mainland recently announced measures as to how recovery of town centres might be achieved. This aspect in the plan is not dealt with in a comprehensive manner and I suggest a blanket ban on any more out of town shopping until this is studied in depth and new proposals brought forward. The current arrangement is a shocking waste of land, the vacant sites and dereliction an eyesore yet we are using perfect greenfield sites for more shopping. I also suggest this is one of the big issues of this plan.
13. The proposals on trees are very welcome but are far insufficient. There are numerous developments underway or recently completed throughout the borough yet there are frequently no trees. The plan makes reference to the environment and climate change yet a basic requirement in this regard is being ignored. The reason? I assume it is either the planners do not insist or the developers refuse to plant trees. Either way it is the responsibility of planners/planning policy to ensure it happens. The planners currently have the where with all to ensure this happens and this plan seems therefore to be a repeat of the current situation. The same applies to the proposals relating to tree protection. These are wholly inadequate. I suggest that the elements relating to trees be revised to ensure certainty in tree planting and tree protection.

Conclusion.

This plan is very welcome and it is pleasing that the environment and climate change are considerations. However, I fear that the plan does not do nearly enough to deal with these two immense issues which are increasingly impacting locally and world wide. The province is in a very poor state economically and during this type of situation there is a need for a far more creative and ambitious approach. Sadly, this is lacking.

Maurice Parkinson
Joy Parkinson.