

Antrim and District Angling Association,
C/O 154 Ballyrobert Road,
Ballyclare.
BT399RT
19th September 2019

Dear Senior Planning officer,

I have been asked to convey to you the Antrim and District Angling Association's response to the council's Local Development Plan to 2030. The Association welcomes this long awaited plan but wishes to emphasise that its lateness has also contributed to many poor development decisions throughout the Six Mile Valley. For instance, the major housing development agreed for Doagh is of major concern and will impact very seriously on the purpose, role and functioning of the Association and its members. Whilst the document has many very worthwhile proposals and suggested policies there are many shortcomings.

The Association has in excess of more 500 members and over many decades the Association's membership has made an enormous contribution to the welfare of the Six Mile valley undertaking major river repair work, planting thousands of trees and promoting the protection of the area. The Association has a waiting list to join extending to 8 years and helps accommodate these interests in some way by providing short term permits. The Association is for all intents and purposes a community organisation and is open to membership from everyone. It is therefore the very embodiment of the most caring organisation associated with the Six Mile valley including the Six Mile Water and its tributaries. The Association also provides a valuable tourism function and attracts anglers from all over the world. The role of the Association is very significant and must be taken into account.

It is crucial to point out that the Association owns/controls the vast bulk of the fishing rights associated with the Six Mile Water and its tributaries. (You may be interested to know the fishing rights associated with this river system have an enormous history having been used on a number of occasions as a major bargaining instrument in the control of these islands). This also includes unrestricted access to fish and look after the river system. We must emphasise this arrangement must be taken into account in the preparation and implementation of this plan.

Basically all forms of development have a direct or indirect impact on the functioning of the Association and its interests from house building to industrial estate development and provision of infrastructure. Water in all its forms is a precious and necessary resource and especially to this Association.

The Association has been fully briefed by the Six Mile Water Trust as to the content of its response to the plan. The Association fully endorses the content of its submission and asks that these views be also registered as the views of this Association. If this is not possible to do please let me know as a matter of urgency as to how the Association can make this happen. In the mean time the Association will assume that this situation has been accepted.

The Association looks forward to hearing from you.

Yours sincerely,

Maurice Parkinson, Chairman of the Antrim and District Angling Association.

Planning Section
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THE SIX MILE WATER TRUST

RESPONSE TO
ANTRIM & NEWTOWNABBAY COUNCIL
LOCAL DEVELOPMENT PLAN 2030

John Kerr
Chairman

18th Sept 2019

**SIX MILE WATER TRUST. RESPONSE TO THE DRAFT LOCAL DEVELOPMENT PLAN 2030
FOR ANTRIM AND NEWTOWNABBEY BOROUGH.**

Introduction.

The SMWT is responding to this draft Local Development Plan in the context of its purpose and role by making comments and proposals that have a direct and indirect impact. The Six Mile Water, its tributaries and their surrounds including Lough Neagh are major concern to the Trust.

The Six Mile Water Trust.

One of the most important areas of landscape in the borough is that associated with the Six Mile Water Valley, its river and the river's associated tributaries. This area is steeped in very significant history, it is a beautiful place and its natural environment through to and including Lough Neagh is of immense value.

Whilst much of this type of situation was taken for granted this changed when a major fish kill in 2008 on this river system resulted in one of the worst fish kills ever in a river in the province. The public throughout the borough, especially from areas associated with the river and its tributaries, were stunned by the devastation and serious risk to the environment and human health.

Immediately following this catastrophe, a major public meeting was held in Antrim Forum, and those attending were of the view that this must not happen again and decided to organise themselves to bring this about. This led to the formation of the Six Mile Water Trust. The reason for mentioning this background is that this type of action requires to be seen by the Council as a major initiative which recognised an important landscape which at its heart is the ownership by its people.

Since 2009, The SMWT has sought to protect and enhance the immediate natural environs of this river system which extends across the vast bulk of the borough. The Trust has a wide range of memberships which includes the angling clubs on the river system, concerned groups and communities, sporting clubs and the RSPB. The work of the Trust is well known and since its formation, there have been major improvements to this landscape both directly and indirectly. An examination of the Trust's Facebook Page will reveal the type of work undertaken by the Trust and its member groups. The Trust directly and indirectly is the voice of 1000's of people on this important area of landscape. For instance, the members of the angling clubs on the river number almost 1000 alone. Their presence and attention to this landscape is very significant but importantly many of these people see their role in the broader sense with a wide range of interests but also having a vested guardian role to ensure this landscape is protected and enhanced.

The Trust and its members are strongly of the view that the natural, visual and built environment are very closely linked and cannot be separated.

The context of the Local Development Plan from the SMWT's perspective.

The Trust is pleased that the draft plan is now published but this has to be seen in the context that it is appearing extremely late. Because of this situation much damage and inappropriate planning and development has taken place throughout what is now the borough. For example, the sight of plastic lawns, tree less housing and other developments, and a multitude of wooden fence surrounds smacks of significant disregard for the natural environment and are eyesores.

The Trust is also pleased that the draft plan is reasonably forward thinking and this is to be welcomed and the council is to be congratulated for its efforts in seeking to secure public engagement in its plan development process. The Trust feels that the Council must bear in mind that since the planning process for this plan commenced in 2015 there have been significant changes in circumstances that have as bearing on this plan. The recent comments and direction articulated at the recent G7 Summit and repeated mention of the need to protect our environment by Boris Johnson need to be factored into the plan even at this stage.

Response to the local development plan.

3.0 Plan Vision.

The Trust suggests that at line 7 the words 'continue to be,' be removed. Not too sure what this means. If it suggests the built and natural environment are currently of high quality and well looked after, we would strongly disagree with this part of the vision. I assume the council means that at 2030 the environment will be of high quality. There is an issue with grammatical context here.

3.15. Strategic Objectives.

Objective 4 re protection and development of town centres, is strongly supported by the Trust.

Objective 4. Sustainable tourism is a positive objective as long as sustainable focuses on environmental sustainability.

Objective 6 is very welcome. This issue is a major weakness in the borough? For instance, there is no footpath between Ballyrobert and Ballyclare! If achieved, it will help create a much better environment and healthy people and also be economically advantageous.

Objective 7 and 10 are strongly supported.

Objective 11. Supported but why are rivers and streams excluded? Please include because they are very much the lungs of our existence. For instance, why have we such much rubbish at sea? Because it all begins on our streets, passes to streams then to rivers and to the sea.

Note also biodiversity is just as important in built up areas as any where else. The wording gives the impression that biodiversity does not exist in built up areas. Please experience the RSPB Belfast Bird sanctuary at Belfast Harbour.

Objective 12. Must include mention of trees in the objective. They are 'all over the world news' at the moment and no one disagrees about their importance other than some of the loggers in Brazil.

Objective 13. This objective needs to be positive as well as negative. Including 'wilding' opportunities and timber production.

Objective 14. Also to include upcycling.

Sustainable Development.

The Trust is concerned that natural environmental elements of sustainable development are frequently downgraded and ignored. For instance, the vast bulk of farm yard developments are never landscaped. It is crucial that this element is strengthened to make this meaningful and positive to the environment and to the health of the population.

SP 1.3. Delivering sustainable outcomes.

The Trust is of the view that this is a key area and involves proposals which have been in place in the remainder of the UK and the ROI for decades. The wording at this paragraph should read, 'Developers will provide'. We have no idea of what 'expected to' means.

SP14. The Trust is strongly in support of this paragraph and asks that it be reinforced. The Trust is firmly of the view that contributions to protecting and enhancing the river environment and in particular protecting access is most important.

4.2. The Trust supports the approach of the Council re this type of sustainable development provided the natural and historic environment are given the consideration required.

4.5. The Trust is pleased to see this inclusion. Unfortunately scattered development under current circumstances is not sustainable.

4.9. Physical and community infrastructure includes river corridors and where they exist they must be protected and enhanced and where rivers are not accessible they must be made accessible and be not allowed to be places of exclusion. These corridors are very valuable assets.

SP 2.15. The Trust is keen to support sustainable tourism and feels that there many opportunities along the Six Mile Valley from industrial and cultural heritage to more natural forms of tourism such as walking, angling etc. Lough Neagh in particular is an outstanding opportunity for sustainable type tourism and the council's new visitor centre is an important addition.

5.20. From an environmentally sustainable point of view there is a need to favour restoration of town centres at the expense of out of town type shopping which is often located on valuable land. This type of approach is supported by the Trust.

Agricultural Development.

DM 4.1 The Trust has major concerns about the impact of agricultural activities on water quality in particular. Whilst most farmers undertake their businesses including farm development in an environmentally sound manner a number do not and as a result water quality and the environment are harmed. The Trust is of the view that this is an area of the plan that requires to be improved upon. It is unacceptable that many farm buildings and the associated waste arising's are not dealt in an appropriate manner. Whilst some farms along the Six Mile Valley are well managed and add greatly to the sense of place others are at the other extreme. It is unacceptable that farm buildings are erected with the minimum regard to appearance and very rarely landscaped.

From a landscape character point of view planners need to put into place a requirement to protect the agricultural landscape especially the protection of rivers, streams, ditches, hedges, trees and woodlands.

The Trust is very disappointed that this part of the plan is dealt with in such cursory manner particularly when well developed and well managed farms can make a very valuable contribution to the environment, built heritage and the sense of place.

Transportation and Infrastructure

6.16 The Trust is supportive of means of transport that minimize damage to the environment and is therefore keen that walking and cycling are given priority. However, to make these modes of transportation effective there must be proper connectivity and advance planning to ensure this is the case.

6.17. Reuse of old railway lines etc. is to be encouraged.

DM 12.1. All very helpful and supported by the Trust. However, it must be pointed out there are disgraceful short comings throughout the borough of basic footpaths and cycle routes. For instance, the situation at Station Road, Doagh where there is a narrow road with no footpath or cycle way is hugely unsafe and as a result there is no safe option other than to use a vehicle. This immediately puts more needless pressure on the environment. This is all the more lamentable when the planners gave planning permission for a major housing development in the vicinity of this area without sorting out this very serious problem.

DM 15.1 Mains sewage is strongly supported by the Trust. However, it is important that there is adequate and high quality infrastructure in place. It is wholly unacceptable that there are still overflows of sewage to rivers and the sea. Separation measures must be part and parcel of all developments and infrastructure brought up to the necessary standard to ensure there is a holistic approach to preventing sewage entering rivers, streams loughs and sea.

The Trust is concerned that there is underinvestment in waste water treatment plants. It is important for the plan to state that development cannot take place where waste treatment plants can not cope.

Unfortunately, the Trust has seen examples where waste water systems on new developments have failed and problems of pollution of the Six Mile Water has been the end result. Invariably there have been issues having these sorted out because of the difficulty of ownership/responsibility. The plan needs to state clearly that mechanisms re long term bonds etc. will be put in place at early development to protect against this type of long term problem.

Homes.

The Trust is very supportive of the strategic objectives for homes.

DM 17.6. The provision of these standards are welcomed by the Trust, however the Trust feels there is still an under provision. It is critical that this open space integrates to form wildlife corridors and is part of connectivity arrangements with appropriate links to transportation, walkways etc. Links to rivers and streams also need to be put in place and open ditches allowed to remain rather than be piped.

Community Infrastructure

The Trust is supportive of the three strategic objectives. In the case of the Six Mile Valley it is important to take into account that of the one of the most valuable community facilities is that of the community use of the Six Mile Water and its tributaries especially for anglers and wild life enthusiasts as well as the general public.

Policy DM23. The Trust is largely supportive of the policy. However, it is not supportive of the possible justifications for development. The Trust feels there is a tendency to develop on open space because it is a cheap option and this is not acceptable.

Trees and woodlands in terms of climate change and their help in improving the environment and peoples' health do not merit a mention and this is not acceptable to the Trust. As pointed out previously there is increasing emphasis on the notion that the

presence trees will have a major impact on reducing climate change. The policy needs to reflect this situation.

Place making and good design.

The objectives are in the main excellent. However, the Trust feels there are cardinal omissions. Trees, woodlands and wild areas are very valuable and must be promoted and formally protected.

In the context of the natural environment and water quality, it is crucial that ditches, streams and rivers are included. This is where water quality begins and in a sense the loughs are seas and the sumps.

Glad to see climate change specifically mentioned.

In the context of the Six Mile valley the use and protection of flood plains are very important. However as previously stated these flood plains in their own right are very valuable resources for everything from sensitive farming to wilding, public access, nature reserves etc. These flood plains along the Six Mile valley are extremely rich in all forms of wild life and are a unique landscape.

A key objective the Trust feels must be included is to give special protection to the Six Mile valley. The Trust is open to proposals as to how this might be achieved but it seems to us the most appropriate mechanism is the creation of the area as a Landscape Policy area. It is essential the area is given special protection via the use of statutory instruments.

In terms of strategic planning and the development of a special place this is a piece of landscape that connects many natural, physical, cultural and historical elements and interestingly joins together the two previous council areas. The Trust points out that there many parts of this proposed area in place and one has only to consider the 4 mile walk from Lough Neagh to Muckamore and also the 1-mile riverside walk at Ballyclare and the riverside walk at Cogry. The new visitor centre adds to the prospect of making the valley a special area.

9.6. Interesting comments here. The borough has major shortcomings in this area. For instance, the large amount of wooden fences which are very visible throughout the borough contribute very little either in design or construction. They are an eyesore and reflect very low quality.

The hideous over use of cul-de-sacs are depressing with little access to public transport and appalling connectivity. The arrangement is also very poor for wild life.

Equally unsightly and environmentally unsustainable are the developments where the rears of houses as opposed to the fronts back on to roads as per Eglantine Avenue near Whiteabbey. At this location there are 80 houses that back on to the main road!!!! The large blocks of vegetation facing on to the road/footpaths are unsafe. This type of vegetation needs to be better arranged to ensure connectivity for people and wildlife.

DM25. Excellent comments here and the trust are very supportive of these but every opportunity should be taken to develop specific actions.

The Trust feels very strongly that one of the most important places for movement and connectivity are our rivers. For instance, one has only to see the number of people who use the Six Mile Park in Ballyclare or the 4 mile walk along the Six from Lough Neagh to Muckamore. Please include this aspect because the council is in a unique situation where river corridors could be a feature of the borough. Please think of the enormous success of the Lagan Valley Regional Park which deserves top marks for the wide range of benefits it brings to every aspect of society.

A rare mention of trees and other landscape features!! Please ensure all these features that have high value are statutorily protected. Similarly, please ensure that every garden being developed has a requirement to have a tree. There are 100's of different trees and lots of species that are suitable for even the smallest garden.

9.18. The council's vision is closely tied to nature. The Trust feels that shop fronts is one area that this vision does not express well enough. There is a plethora of plastic shop signage throughout the borough. At a time of the over use of plastic and concern about their use because of the break down into tiny particles the Trust would ask that the council take planning measures to reduce the use of plastics for this purpose. The fragments of plastic make their way into gulleys and eventually in to our rivers and the sea.

Historic Environment

The Trust is happy to support the plan's objectives and policies for the historic environment. It is unfortunate the plan in the context of the historic environment does not highlight in a collective sense the combination of the built and natural environment of the Six Mile valley. The Trust feels the plan needs to be taken into account that the events in particular from the 17th, 18th and 19th century have left a landscape that has been shaped by events during that period. This includes many significant buildings and in particular a landscape including towns, villages and hamlets that visually relates to a specific plantations of people. Closely related to this consideration is the enormous industrial history of the Six Mile valley. Every effort should be made to protect the remains of this heritage and enable its restoration for e.g. the mill at Islandreagh and the mill remnants at Muckamore. As will be indicated later in this submission the natural landscape of the valley is very rich and has such richness that merits it be given special protection. The area could then become an outstanding area not just for inhabitants but in particular visitors.

Natural heritage.

The Trust is supportive of the bulk of section under this heading. However, we have a number of major concerns.

The various proposals are not sufficiently objective and there is far too little expression of making improvements and enhancing protection of these natural assets. Whilst place making is one of the themes of the plan this section is not dealt with in that context. There are significant opportunities to create places with significant natural value but the examples included are far too few and key areas are not included or mentioned.

The Trust in the previous two paragraphs has outlined very firmly, that in the case of the Six Mile valley the natural and historic environment be considered as a single entity and the points made previously on the subject need repeating under this consideration of natural heritage.

The Trust is very disappointed that at this juncture the Six Mile Water and also any rivers such as the Maine and Crumlin River do not receive any mention. Could the Trust politely say to the council, please let us organize a tour of these amazing places to help those developing this plan understand and appreciate them. There is mention of hills but one of the most important valleys in the province i.e. the Six Mile valley does not receive a mention. The Trust finds this very strange to say the least and is a major omission. The Trust has previously responded to the plan's landscape assessment exercise and highlighted in some depth why this landscape is unique.

The objectives for this section of the plan we feel are poor and seems to be built development led. This approach does not respect sustainable and progressive planning.

SP. 8 It seems very odd to the Trust that under this heading there's virtually no mention either directly or indirectly of the aquatic environment and in particular the associated species. This comes at a time when water quality has become a major issue all over the world but also locally. A recent report from DAERA highlights this issue and states far more needs to be done. One would have thought this document would have been a consideration for the authors of this strategy.

The Six Mile Water has a wide range of significant species of life such as a rare river crowfoot, Atlantic salmon, white claw fish and lamprey. The importance of this river in this context needs emphasizing.

SP.8.6 The Trust feels that as a minimum the Six Mile valley must be made a strategic landscape policy area.

SP8.7 This type of proposal is supported by the Trust. However, the mention of 'river banks' is totally inadequate. The Trust feels very strongly that river buffer strips and corridors be provided. This creates the the habitat needed for wildlife, including those species which are mainly land borne and also gives the needed cover for water based species such as fish, otters, birds etc. I remind the council that the access to the river banks and river are subject to legal rights which encompass the right to fish and the right for access to fish. These rights are in the ownership and control of the local angling clubs and the rights extend to the clubs' members and guests.

Paragraph (e) is inadequate. This needs to also include individual trees.

Landscape protection

The Trust notes and supports the inclusion of Carnmoney Hill as a strategic landscape policy area. It is very disappointing that despite its history and natural beauty from Lough Neagh to Ballynure that the Six Mile valley does not get a mention, never a designation as a strategic landscape policy area. Could the council's planners please provide some explanation why this omission has occurred?

Trees and development

The Trust is pleased to see this inclusion in the plan.

Unfortunately, the Trust has seen the devastation of tress in around development and other sites in the borough. The Trust's experience is one of virtually no protection throughout and it appears there are significant flaws in the process. The Trust is of the view that the issue of tree protection is dealt with at the very earliest opportunity and asks the council to proceed on the basis of best practice of which there is a multitude of good examples throughout the UK.

A significant weakness is the council's lack of an appropriate response to sites under threat and the apparent lack of any action to protect trees and woodlands outwith development sites. These are major short comings and the Trust feels strongly that good quality trees and woodlands where ever they are should be protected. It is often the case that trees are damaged or destroyed by planned or unscrupulous development of some form.

DM 42.1 This paragraph is positive and the Trust welcomes the inclusion of hedgerows, especially those that are native and which are of immense value for various reasons.

DM 42.3 The Trust's experience is that far too many hedgerows and trees are removed at development sites and there are plenty of examples to show that the replacement trees are of an inappropriate quality and species. In addition, the replacement trees do not in any way equate in size and developers in these cases must be required to provide replacement

trees that are fit for purpose and are specially grown as mature specimens and planted and maintained using the best practice and according to the appropriate British Standards. The comment of a net gain in numbers of trees is seriously flawed. This implies one can fell a valuable mature tree and replace it with a dozen transplants!!!

DM 42.5 The Trust is concerned about the generality of this paragraph. This appears to the Trust to be an inappropriate response to a major problem that currently exists in the borough.

11.51. See section DM 42.3 above. This paragraph is also seriously flawed.

11.52 and 11.53. The Trust is most concerned about the issues raised in these paragraphs. This wording and proposed action is not adequate. Trees continue to be felled under this approach in the borough and in addition the council is of a mind not to use tree protection measures. To protect 'potentially vulnerable trees' is a wholly inappropriate approach. If the trees are valuable they should be protected. The Trust has experienced the felling of trees in this category, despite asking the planners to intervene at an early stage.

Tree valuation systems.

The province and also the council area is devoid of trees. Those trees that remain especially in around development areas are under immense threat and the Trust is of the view that such trees must be protected by TPO's. Coupled with this is the need to have an appropriate amenity tree valuation system in place to discourage anyone with the inclination to fell trees. There are many good examples of these administered by local authorities throughout the UK. The Trust asks that this be included as part of this local plan and included in a coherent manner so that there is a guarantee that what is developed actually works.

Natural resources

DM45. Renewable energy development. The Trust is in favour of renewable energy provided it is sustainable and is not damaging to the natural environment and wildlife in particular. The Trust supports the headings indicated at this paragraph. The Trust is particularly concerned about river based hydros and is particularly concerned that the current regulations are very poor and only relate poorly to several species when in fact they impact on many other species of wildlife such as lamprey, eels etc. This situation should be reflected in the highlighted areas under a heading of water based migratory fish and other wildlife.

Environmental resilience and protection.

13.9. The Trust notes the list of areas where there is a need to control development. Over many years development near rivers and streams has resulted in many pollution incidents throughout the borough. The Trust asks that rivers and streams be added to the list in this paragraph.

DM47. Like many others the Trust is concerned about the additional amount of surface water that is being generated through many forms of development such as agricultural drainage to housing developments. The Trust welcomes the council's approach but suggests the council could do much more for example by having slow drainable driveways in housing developments and other forms of sustainable drainage schemes.

Other natural forms of storage of water such as reservoirs, ditches and dams need to be retained and a distinct preference of natural open and meandering ditches as opposed to concrete/plastic culverts and pipes is a key necessity and also has major wildlife benefits.

Contaminated land.

DM52. The Trust is very concerned about this issue and is currently involved with issues associated with a number of sites. The potential for damage to the environment is very significant and the same applies to human health. The Trust asks that the investigation mechanism is fully professional and robust in its nature.

DM46. The Trust has major concern re development of any kind on flood plains. Some of the floods in recent years have well illustrated the problem and forecasts state these events will get worse and more frequent. The flood plains need also to be seen as a major asset not just for helping to alleviate flooding downstream but also as a mechanism to protect the rivers themselves. In addition, these plains are of enormous value for creating specialist habitats for many forms of wildlife.

The plan needs to continue promote and legislate for benefits of sustainable drainage in all developments.

Conclusion

The Six Mile Water Trust welcomes this Local Development for the borough and much appreciates the approach that the council took regarding community engagement and also the subsequent process enabling consultation.

Much of the plan is to be welcomed and in particular the relationship to the natural environment and also to climate change issues.

The Trust is not impressed with the built development led approach especially at a time when there are major climate change and natural environment issues.

The Plan's visionary objectives are workman like but lack real vision and and the Trust feels this is a missed opportunity.

The Trust has failed to find any visionary ideas or proposals throughout the plan yet there are opportunities throughout the borough. In short the plan lacks ambition, is weak on creativity and short on drive. This is despite the council's excellent visioning process that led to, 'It's in our Nature'.

One would have thought that this plan would have put in place the policies and proposals to create an attractive area to retain and attract high quality professionals and high quality businesses to the borough to create wealth. This has to be seen in the context that the province is the weakest area economically in the UK and during the current week there are warnings that the province is in or about to enter a recession. The Trust feels that a thriving area can also be very good for helping to deal with climate change and enhancing the environment.

A major concern the Trust has with this plan is that of how the subject of trees is dealt with. This is said in the context of current climate change issues, environmental degradation and the fact that this island, with the exception of Iceland is the least treed in Europe. Far too little has been proposed to protect what we have and very little proposed to enhance the tree population for the future.

The Trust finds it baffling why the borough's key river barely receives a mention and this situation is reflected throughout the plan. It is the mainstay of an outstanding valley rich in biodiversity, ancient and more recent history, all of which have all helped to create a unique place. The plan only makes a cursory mention of the valley's industrial legacy of the past re its mills of which there were 14 from Tildarg through to Antrim. The quite outstanding history of Antrim itself does not feature. The Trust is firmly of the view that this unique area must be designated as a Strategic Landscape Policy Area and enhanced to create a special

place. The area has already many of the key elements in place to do this and has endless opportunities to enable further enrichment.

MP 18th Sept