

NAP/5646

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Mr A A Meenagh
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Dear Mr Meenagh

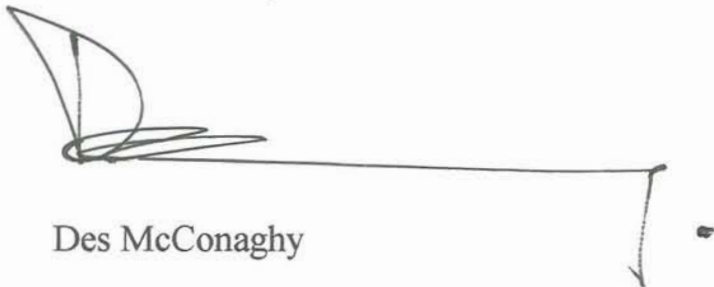
DRAFT NORTHERN AREA PLAN 2016

I attach my objections and representations vis-à-vis your Draft Northern Area Plan 2016.

As noted in my preamble, PS/Angela Smith MP suggested I could formally raise my views on NI DETI's approach to the developments at the Giant's Causeway World Heritage Site and surrounding areas (and my various representations to the NI DOE on the development plan system) as comments on your Draft Northern Area Plan. I am therefore copying this letter and enclosure to Michael Duffy (PS/Angela Smith MP).

Since my representations concern a World Heritage Site and a current international architectural competition I am also copying to Ian Pritchard at the RIBA in London and to Dr Mechtild Rössler at the UNESCO World Heritage Centre in Paris.

Yours sincerely



Des McConaghy

**Draft Northern Area Plan 2016
Objections & Representations**

Submitted to Mr A A Meenagh, Northern Area Plan Team Manager

**Respondent: Mr Des McConaghy
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a free-for-all dressed up in rules and regulations?

This objection follows my comments to Angela Smith MP (Minister for DETI, DE(NI) and DEL) about (a) the need for an alternative approach to her strategy and plans for the new **Giant's Causeway Visitor's Centre**; (b) the *prior need* for an approved statutory Area Plan, given the importance of this site and; (c) the case for a statutory Local Plan for the Causeway WHS and it's approach; all to be resolved before a Visitor's Centre decision. I also referred to the poor approach to rural planning in general and the need to update the planning system. PS/Angela Smith suggested that I could formally raise these issues with you before 6 July.

Hence these Representations. The way Northern Ireland Government deals with its famous World Heritage Site and main tourist attraction is one of its most important challenges and therefore a central issue of to the Northern Area Plan.

So this objection mainly concerns your Northern Plan **Part 3; Section 6 (Policy COU 10)** and **Section 4 (Designation COU 5)**, and to some extent Tourism (Section 5). It also addresses the need for a statutory local action area plan for the Causeway approach area; from "Weir's Snout" and embracing the townlands of Carnside, Ardihannon and Ballylinny (my Exhibit A). My representations also imply a large and qualitative increase in regional tourist facilities, and perhaps an extension of "Settlement Limit" at adjacent town of Bushmills (Map No. 5/02).

I also have in mind representations made by myself to the NI DOE over the past eight years with regard to imprecise and out of date planning procedures and notoriously ill-considered approvals in the above general Giant's Causeway area.

My interest extends beyond that of a retired architect and planning officer. My great grandfather built "Warren View", the traditional family house beside the beautiful "Causeway School" (now a museum). My grandfather was "the master" at that school and at "The Nook", the earlier "listed" school, for over forty years. These *three buildings* form a precious indigenous group on "Causeway Head". Then (as a voluntary retirement activity) my late father widened and extended the Causeway cliff-top walks for the National Trust. So I have a personal interest!

Draft Plan; Part 3, Section 6 Giant's Causeway World Heritage Site

1. The Draft Northern Area Plan relies heavily on "The Causeway Coast AONB Management Plan" of April 2003 (Para 6.2). That re-assembles familiar material while distancing itself from "Statutory Planning" which (it says) "is less concerned with and can have little control over the practical day to day management of land" (Vol 2, p. 6). But some of its own "management" proposals are indecisive about who does what and who pays for what. I will show that much more robust advice is needed on specific plans and action if positive results are to follow.

2. The WHS 4 km "buffer zone" (PPS6) for development control now gives way to a wider "Distinctive Landscape Setting" where proposals "will be subject to particular scrutiny". This is too subtle advice in an AONB where a mansion arose as a "replacement dwelling" on the edge of White Park Bay (Exhibit B) and where consent is given for a public house at the entrance to the above WHS site ("the Nook")! Examples abound (see para. 18 below). We need (a) clear presumption against any private development (except for bona fide farmers) alongside (b) a flexible strategy for legitimate development pressures at the towns and villages.

3. For example, it is pointless delineating a strict boundary for the "Settlement Development Limit" in Ballintoy (Map No 5/05) when obtrusive developments can appear a short distance to the West; in that case to the clear detriment of really magnificent coastal views (and of Ballintoy Church) from the (B146) coast road.

4. A much stricter policy should apply in the AONB. The need for public works should also be rigorously tested between the "coast road" (B146) and the ocean. Then, too, the Draft Plan's policy on Tourism (Section 5 & Policy TOU 3) permits dwellings (as holiday accommodation) with alleged conditions for "short term rental" (unenforceable over the long term) and which already now "pepper" the Causeway Plateau, including land between the B146 and the sea near the WHS.

5. (Policy COU 10, para 6.6) So the case for any extensive facilities at the Giant's Causeway Visitor's Centre must be tested to the limit. In particular the green breast of beautiful "Causeway Head" (visible for many miles to the West) should be protected, restored, and kept as free of development as possible.

6. Tourists come to celebrate a unique, beautiful and world famous natural phenomenon, not further opportunities for shopping and dining! Thus the Draft Plan's para. 6.6 rightly poses a (generalised) warning that "attractions not essential for visitor needs will not be acceptable, nor development generally". But precisely the same paragraph then also accepts a (generalised) "need to provide appropriate essential facilities" without first posing the most important question for any important WHS celebrating nature. That question is as follows ...

- ***what public facilities are strictly essential for viewing the site and what can be located (and more effectively provided) elsewhere?***

7. This then is my main objection. The Draft Northern Area Plan (and now the NI DETI "International Architects' Competition" for a Visitor's Centre) were launched without opening up and resolving this very basic strategic question. The present NI DETI brief is for a full range of facilities (that is, interpretation, shopping, tourist information centre, dining and parking) on the site of 3.64 hectares owned by Moyle DC and spanning Causeway Head (see **Exhibit A**). And the award of a winning design is now scheduled before the approval of the Northern Area Plan!

8. By proceeding before planning criteria is settled, NI DETI and stakeholders may revisit some problems faced by Moyle DC when they launched the earlier Causeway International Competition for commercial sponsorship of the facilities on the same site. The NI DETI and NI DOE encouraged this absurd strategy though clearly inappropriate for the Causeway WHS. There was an absence of planning criteria and with only two (local!) bids the project was finally dropped.

9 The above Causeway Coast AONB Management Plan also states that the Visitor's Centre site should be "considered in the context of a wider transport strategy for the AONB" *and* "all of these issues point to the need to review the purpose, type and scale of visitor facilities at the WHS and in relation to a wider visitor management strategy for the whole of the AONB" (Vol. 2, page 55). I agree – but then the Management Plan failed to follow this to any conclusion.

10. Instead the AONB Management Plan says that a new Visitor's Centre should be located on the 3.64 hectares site of the existing Centre. So it is important to note their two main reasons given for this decision. Firstly there is "precedent" and secondly "ownership": the 3.64 hectares are the best location since Moyle DC owns the land. There is no need to comment on the vacuity of this advice!

11. The ANOB Management Plan nevertheless also gives the following important advice: "A clear long-term strategy for the facilities is also important in order *to avoid the gradual accumulation of facilities at the site as the number of visitors grow*" (Vol 2 page57) (my emphasis). The NI DETI Brief for the International Competition calls for a design capacity for "up to 500,000 visits (per annum) by 2008". The current position is around 400,000 visits and the Brief also notes that "it is impossible to predict levels of admission with any degree of accuracy". But given the recent rate of increase in visits, the equally recent advent of cheap global travel and also the prime place now given by the NI Tourist Board to the Causeway in promoting Northern Ireland, there is a clear danger of concentrating all facilities on one constrained location, as well as inviting future untidy additions.

12. Even without the (preferable) option of dispersing non essential visitor facilities (see para 9 above) there is still also no reason why the Visitor's Centre at the Causeway should be entirely located within Moyle DC's 3.64 hectares dominating the headlands. As can be seen (Exhibit A) there are additional sites immediately adjoining – and moreover sites where the ground falls rapidly (see bench marks) from the prominent Causeway Head site down to the narrow-gauge Bushmills/Causeway railway terminus with its sheds and extensive car parks.

13. This is all an unresolved and untidy area. There is a poor layout of roads, (and constant parking along those roads), an impossible main road corner and junction at the access to Moyle's 3.64 hectares site. This mix-up and a need to rationalise ownerships and land assembly requires a statutory local action area plan – which I have argued should have been brought forward under Sections 85 and 86 of Part VII of the Planning (NI) Development Order 1991. In the meantime speculators have bought many sites in and around this area and without a plan or extensions of public ownership there will be many appeals and little progress.

14. Moreover I have suggested this local action area plan approach (which in NI is more normally operated by the NI Department for Social Development in urban areas) given the clear need for land acquisition for site rationalisation and the proper scheduling off all public works associated with road realignments and appropriate landscaping and the continuous maintenance of the whole area. This must also involve a better relationship with the unresolved narrow-gauge railway.

15. Note that the additional Management Plan (DOE/National Trust/Moyle DC) submitted to UNESCO in January 2005 states (under "Managing Change in the Setting of the Site" (para 5.7.9)) "At present beyond the recommendation in the Causeway Coast AONB Management Plan, there are neither clear guidelines on land-use management within the setting of the Site (WHS) *nor a clear vision for the nature of the landscape in and around the site.*" (my emphasis).

16. When the old Visitor's Centre facilities were destroyed by fire in April 2000, NI Ministers and NI Departments should have immediately set in train the above Giant's Causeway comprehensive local planning exercise and they should have brought forward - within their annual Departmental Estimates - sufficient public expenditure provision to **implement** that plan plus an overall strategy for tourism at the Giant's Causeway and throughout the AONB. That has not happened.

It needs to happen now! "Development planning" is still a long way from action.

Draft Plan Section 4 (CPAs) and Designation COU 5.

17. I refer now to the NI planning system's inability to limit the proliferation of single dwellings and such inappropriate developments in rural areas. This concerns the Draft Plan's "Countryside Policy Areas" (CPAs) and the Causeway Coast Countryside Policy Area (COU 5). I will also comment on the general distance of all such NI policy statements, Area Plans and the Regional Development Plan processes from positive planning and executive action.

18. Firstly the NI DOE should take on board the Report of the Planning Commission established by the National Trust, "A Sense of Place: Planning for the future in Northern Ireland" - in particular the excellent Section 3 of that Report dealing with "Single dwellings in the countryside" (National Trust March 2004). The report notes that in 2002-03 no less than 6,960 single dwelling were completed in the countryside outside settlements: a record for Northern Ireland!

19. Section 3 of the Trust's Report meticulously explains how this escalating desecration of the countryside happens by ignoring the NI DOE official policy statements or by exploiting their often subtle ambiguities. It is a splendid "job creation programme for lawyers" but the result is a scandal. As the Trust's Report states, "Policies should be succinct and *unequivocal*", (my emphasis).

20. One of this report's main points is that the "General Principles" (Planning Policy Statement 1) still includes a general presumption in favour of development in spite of whatever plans may have been adopted. Therefore the Report suggests that Article 30 of the Planning (Amendment) (NI) Order 2003 giving effect to a plan-led system should commence immediately (Trust p.5). The NI DOE resists this until such time as the whole Province has approved Area Plans.

21. I have unique personal experience of this policy area having attempted NI's first rural planning policy as early as 1965. I then mapped a 10 year "projection" of planning applications received in the 100 square miles of Craigavon Designated Area (then averaging 60 applications per month) to demonstrate to the NI Ministry of Development the devastating effect that poor control would have for servicing, reliance of septic tanks etc., and for the loss of amenity in the rural environment.

22. Consequently the Ministry CPO, the six NI County Planning Officers and myself put together a rural policy strictly forbidding single dwellings in the NI countryside outside built up areas (except for bona fide farmers' use as certified by the NI Ministry of Agriculture). We also imposed strict traditional design standards in all cases and immediately applied this in the above 100 sq miles where the Ministry called in planning powers under the New Towns (NI) Act 1965.

23. Of course it was unpopular in a Province new to planning - though those with personal access to Ministers found informal procedures by-passing my professional scrutiny! But more generally the locally elected councils (formally consulted but no longer responsible for development control) saw no electoral advantage in refusing applicants when the odium now rested with Ministers.

24. This centralisation became general with the Local Government (NI) Act 1972 and "direct rule" from Westminster the same year. But eventually the discomfort of civil servants with the above executive role led to the "Review of Rural Planning Policy" by Dr W H Cockcroft (HMSO 1978). This effectively "rubber stamped" a relaxation of control throughout NI since (para 5) "a strict system of control in a rural community would not necessarily lead to general acceptance."

25. Twenty seven years later the disgraceful results can be seen by any visitor to the Province. So I firmly support the Trust Report's idea to devolve development control to the new local authorities following the present NI Review of Public Administration. But the effectiveness of this will also depend on plan led decisions (my para. 20) and a rational, clearer and a more economical consolidation of NI DOE "Area Plans" and NI DRG "Regional Development Strategies".

26. This reform must reduce the number of NI Departments formally responsible for spatial planning. The NI Department of the Environment (DOE) is mainly involved with the general administration of NI Planning legislation but the NI Department for Regional Development (DRD) is also responsible for spatial planning under Article 3 of the Strategic Planning (NI) Order 1999. Then too, as we saw (para. 14 above) the NI Department for Social Development (DSD) promotes and administers certain comprehensive local planning proposals.

27. My case to NI (DOE) on rationalisation has also addressed the confusion (by no means limited to NI) as to the proper scope of town and country planning legislation. It is often confused with some sort of general governmental decision-making process whereas its statutory function should focus on physical land-use planning. Large scale Area Plans in NI (like UK "Structure Plans" in their day) try to cover too much, take much too long to prepare and are often soon out-of-date.

28. This view also coincides with those in the Planning Commission's Report already referred to at para. 18 above; "Area Plans should be objectives-led, shorter, clearer and less definitive in detail, enabling full coverage to be achieved more speedily". I have then argued that staff resources could be deployed in a flexible way for the preparation of statutory local action area plans in specific local areas which, from time to time, face intensive development pressures or tasks.

29. **The Giant's Causeway** is an obvious candidate for such a Local Action Area Plan (my para 13) but must also secure enough public funds for progress on the ground (my para 16). That is a separate matter from the Draft Plan and all the above statutory planning but I have found that the general UK public rarely understands this distinction. The Draft Area Plan refers and defers throughout to the earlier NI DRG's Regional Development Strategy "Shaping our Future" (2001) which warns everyone (at page 3): "nothing contained in this document should be read as a commitment that public resources would be provided for any project."

30. So those concerned with action must look beyond the present planning documents to the way the NI Government's "Programme for Government" reads across to financial data in the annual Estimates and how, in turn, that information relates to the planned local outputs. Unfortunately this is not an aspect of public participation that has been especially encouraged in any part of the UK or Ireland. But to spend is to choose – and the rest is relatively rhetorical.

31. The NI DETI initially tried to restore facilities at the Giant's Causeway with almost no call on public expenditure (my para 8)! The Department's 2004 Budget now contains a provision for £11 million on a contingency basis. It is not enough!

My personal preferences for access to the Causeway WHS

32. Without prejudice to the above representations I hope I may add some more detailed personal views on how policy options at the Giant's Causeway could develop.

33. The Action Plan (my para. 13) would house the very minimum range of essential visitor facilities on the MDC site (see Annex A) and perhaps some further facilities at the lower level (rationalising the existing layout and railway). The balance of facilities (and associated new opportunities) could then be provided at a totally new tourist centre, possibly two miles away at Bushmills.

34. This Action Area Plan could consider the realignment of the B146 from a position somewhere below the Aird to the Causeway Road at lower Ardihannon. That could deal with the very unsatisfactory and dangerous corner at "The Nook" (currently the main WHS access point!) and also allow visitor vehicular from the lower B146 to a low level entirely screened facility. The Causeway Hotel, "The Nook", the Causeway School and "Warren View" would be served by a cul-de-sac for residents vehicles only.; a much needed rationalisation.

35. The new Causeway Coast sub-regional tourist centre could be located as an "infill" extension to Bushmillis "Settlement Limit" (see **DNAP Map No 5/02**) adjacent to the "Bushmills New Bridge" and between "Riverdale Lodge" housing and "Tramway Drive" housing on the Portballintrae Road.

36. This site at Bushmills would pose no aesthetic problem, nor an obstacle for including the commercial sponsorship that DENI first proposed for the Causeway headlands. On the contrary the location capitalises on the additional global fame and tourist draw of Bushmills Distillery. Thus space for "state of the art" Giant's Causeway interpretation facilities, education workshops, craft and other shopping facilities, a modern sub-regional tourist information centre and relatively unlimited parking could all be given "full reign" – along with restaurants and public houses.

37. This location could also incorporate the terminus of the Bushmills/Causeway narrow-gauge railway which now ends irresolutely along the Portballintrae Road ...well away from anything or anyone! So the Centre could also celebrate the original Causeway tram – *the world's first hydro-electric tramway* – so much part of the traditional "Causeway experience". The Bushmills Walk Mills (Salmon Leap) power-station is still modelled in the London Kensington Science Museum – the tram's colourful carriages were celebrated at the old Causeway Visitor's centre and are still at the Belfast Cultra Museum. Time to bring them home!

38. This extensive regional parking facility provides not only railway customers but it immediately opens up the chance to plan a major new "park and ride" shuttle service for all points along the Causeway Coast (and for the WHS to Dunseverick, Benbane on the Causeway cliff-top walk well as Causeway Head). A properly planned "park and ride" is in completely in line the DRD regional proposals and could embrace Ballycastle and the Glens, as well as transportation of visitors from cruise liners and for to sea experience tours – a now neglected but once traditional "Causeway Experience" – from Portrush and Ballcastle..

Des McConaghy 4th July 2005

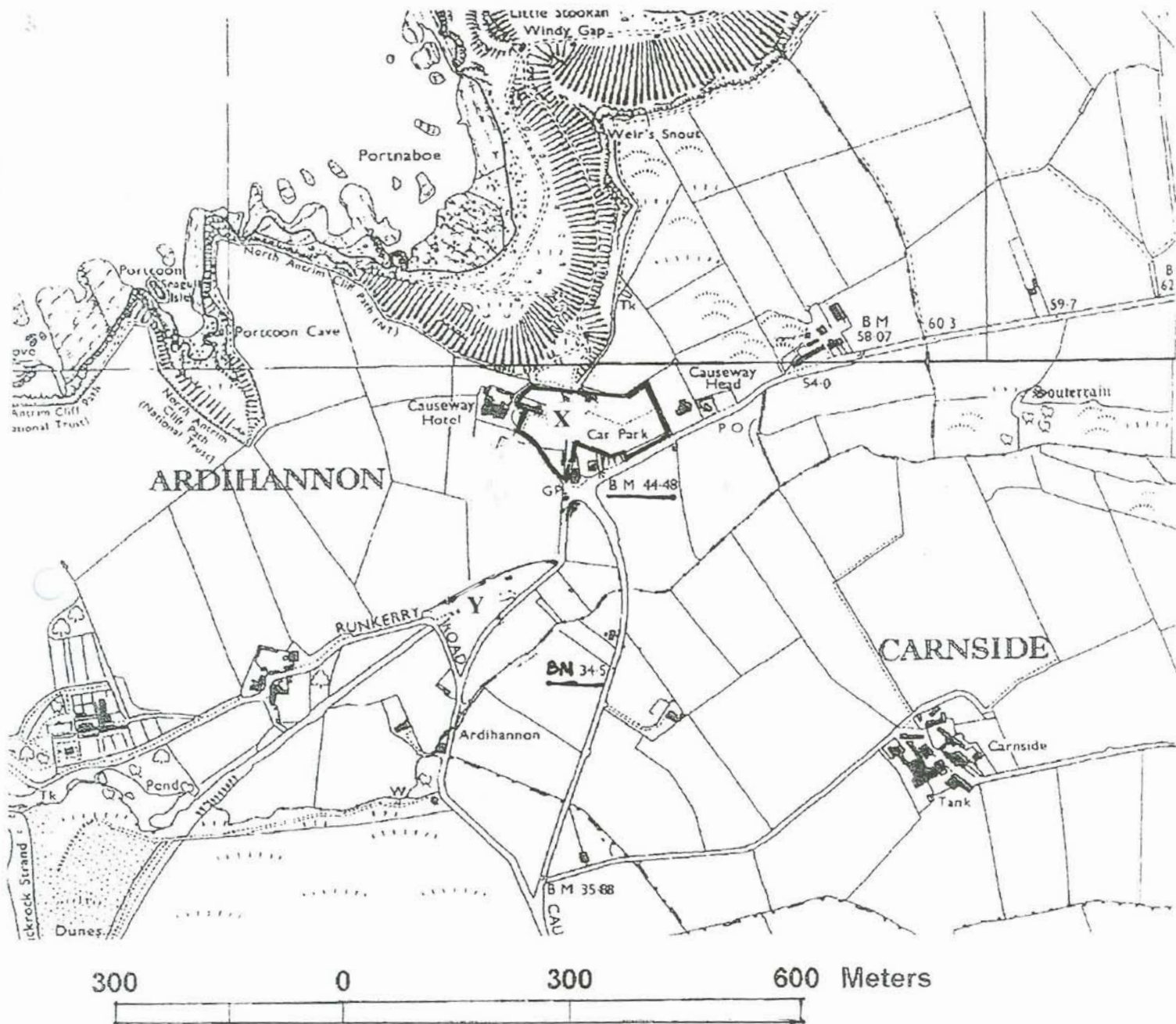


EXHIBIT A

DETI Proposed Site for Giant's Causeway Visitor's Centre

X: Proposed Site

Y: Railway Teminus and Railway Parking





“The proposal was determined having regard to Policy HOU13 of the Department’s Rural Planning Strategy which allows for the replacement of existing dwellings in protected policy areas, subject to certain criteria” (J Lambe, Planning Service CEO’s Office, 24.10.97.

This mansion did not in fact meet the criteria of HOU13, and sits on the edge of National Trust’s magnificent White Park Bay. The Trust was not notified of the application since the DOE claimed it only needed to notify “the occupiers” of other buildings with 90 metres of the site boundary and there were no such other occupied buildings.

“Replacement dwelling” at Whitepark Road, Ballintoy