MEA-DPS-021

Glenarm Visitor information Centre

Local Development Plan Team 17 New Road

County Hall Glenarm

182 Galgorm Road BT44 0AA

Ballymena 6 December 2019

BT42 1QF

Dear Ms Clarke

Response Draft Plan Strategy Mid and East Antrim 2030---- Feystown Small Settlement Map 2

I write as a Community Volunteer and part of a larger team of Volunteers who have been involved in economic regeneration of the Glenarm area primarily through the promotion and development of tourism since 2000. We have consistently described our area of interest as Glenarm, ie the Village and its hinterland because the 2 are interrelated, interdependent and complementary so that village, rural community and Feystown Settlement constitutes 'Glenarm and Glen' in Tourism NI terms.

The Tourism profile of M&EA District lists KEY assets at Built Heritage 4.4 which apply particularly to this area "having a rich archaeological heritage with standing stones, raths, cairns and monuments distributed across the countryside." This area is particularly attractive to walkers, cyclists and in recent years a Mecca for film makers, (as recent as September 2019) because of its relatively "undeveloped" character with absence of poles and overhead cables. But undeveloped does not in this case mean unknown or unused.

The Northern Ireland Visitor Guide Map, a very popular publication by Discover Northern Ireland, is also available in the 4 main European languages (for past 6 years) and in the past couple of years it has been produced in Mandarin for Chinese visitors. The Visitor Guide Map shows a looped driving route from Causeway Coastal Route at Glenarm via Feystown, which was afforded brown tourist signage- returning to Coast by Glencloy to Carnlough." It is a route taken by many independent travellers and the ever open Feystown Church with adjacent car-parking, and its cemetery with the Lady Antrim sculpture of the Boy Patrick facing Slemish, is a focal point. The spike in Coach Tours, national and international of all sizes, visiting Game of Thrones filming locations at Sallagh, Cairncastle and Slemish pass through Feystown to re-join the Coast Road at Glenarm Village.

Feystown is scenically beautiful, very attractive for walkers and cyclists and 1 of only 2 Antrim Glens within the M&EA boundary and as such and because of the tourist amenity contribution detailed, I feel that it merits retention of status as a small settlement.

Accordingly I consider that the Draft Local Development Plan 2030 fails the Soundness Test for consistency and coherence.

Consistency

M&EA Council has the much lauded mantra for its Community Plan of <u>Putting People First</u>. It's Spatial Growth Strategy SGS 1 "to sustain rural communities living in and around villages and small settlements 'should mean that the Feystown small settlement would be retained on the Hierarchy of Settlement, alongside new growing small settlements which merit inclusion. I accept that development must be sustainable (ideally but not guaranteed even in large towns) and address economic, social and environmental objectives; but it is the lack of increase in population which is the chief determining factor in de-designation of small settlements in this Draft Plan.

Of the 25 Strategic Objectives detailed by M&EA on which the Sustainability Appraisal at Key Issue 2 is based, there is only 1 objective to facilitate population increase - 'provide sufficient supply of land for new mixed tenure housing in convenient locations.' Feystown area is unique in that it has never ever had the 'provision of any good quality, sustainable housing' never having any public housing or public transport provided so that young people and retirees, formerly in cottages tied to farm work, have had no option but to leave the area. Option 2 b which appraises Feystown in this exercise produces a series of Zero scores and the conclusion by M&EA is that

'these settlements do not appear to have grown and offer little in the way of service provision.'

I would suggest that the presence of tourism attractions, highly valued landscapes and opportunities to engage in outdoor pursuits such as shooting, hang gliding, model aircraft flying and hill walking together with new tourism employment in the area renders this test meaningless in content.

The Local Development Plan in this case 'does not shape place' as the Overview claims, and certainly fails in delivery of Council Community Plan of Putting People First

Coherence

I consider the draft plan is <u>not coherent</u> in applying the designation of a small settlement as detailed in Technical Supplement 2 Settlement Hierarchy.

Evidence base for such is described at 3.1

'built up nodes in the countryside ... that have a concentration of buildings displaying an obvious sense of cohesion and place offering 1 or more community facilities.'

The present Feystown small settlement is based around a church built in 1828, replacing an earlier church built further back on the hillside and now part of the abandoned old Feystown Village. This former site has been identified by Community erecting a plaque and leading walks there with permission of the landowner- so there is an obvious 'sense of place' and a great pride in that place engendered by community.

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The Church meets the definition of settlement at 3.1 as it 'provides 1 or more community facilities' It is used for Church service on a weekly basis and its extensive surrounding Cemetery, in Parish ownership and maintained by Community serves an area well beyond the Feystown settlement boundary.

The Church Community, residents of the newer bungalows and the period properties, all display 'an obvious sense of cohesion' so that the Feystown small settlement reflects appropriate contemporary design while respecting Historic Environment guidance and listing. The Church with small bell cote, is surrounded by a high wall built in local stone and with cast iron gates. Church, wall and gates have B2 listing and are maintained in excellent condition. The extensive cemetery, in Parish ownership is maintained by community and there is a sense of shared ownership of the Church property.

The same 'sense of *place*' by Community applies to the Feystown Townland area and particularly to a community owned sports field and meeting rooms a short distance from the Church settlement.

These are the only sports facilities serving this long coastal stretch of M&EA-from Larne to Garron Point and they are extensively used by home and visiting teams in competitive games.

Considering that Feystown is within AONB, an area of Special Archaeological Interest, with the Antrim Hills and International Appalachian Walking Route bordering the Townland and the Feystown Nature Reserve leased to Ulster Wildlife Trust (from the Church) and as a person involved in local tourism over many years I question so many Zero results in the Sustainability Appraisal which seems to have been the deciding factor in de-designating Feystown from the Settlement Hierarchy. I would appeal to have Feystown reinstated for the reasons detailed.

Yours Sincerely