Ministerial Advisory Group for Architecture and the Built Environment NI

Antrim Coast and Glens AONB Draft Management Plan: Consultation Response

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Preamble:

- AONBs were identified for designation because of the distinct character of their landscape.
- The designation (NCALO 1985) endeavoured to stipulate purposes for:
  - Conservation and enhancement of natural beauty or amenity, wildlife, historic objects or natural phenomena
  - Promotion of public enjoyment
  - Provision of maintenance of public access
- Boundaries of such designated areas were not necessarily accepted, as benefit to population and lifestyle with such areas was not clearly apparent. EHS acknowledges that acceptance of AONB (re)designation will depend on overcoming perceptions of planning restrictions as being harmful to rural development, and engendering acceptance of the benefits of sustainable management.
- The value and quality of AONB landscapes at the time of their designation arose from the distinct qualities of that place in interaction with persisting characteristics of the society which lived and worked within it.
- Landscape is the resultant of interaction between territory and lifestyle. Thus, to sustain landscape value it is important that the lifestyle of the inhabitants of that place is intrinsically linked in a mutually beneficial manner to the value of that landscape. It is evident that degradation in landscape quality has arisen when the lifestyle of the inhabitants of that place has diminishing cognisance and involvement with the place itself.
- For that reason, the primary aim of a management plan which aims to enhance and sustain landscape quality and value must be to engender, for mutually beneficial purposes, awareness and respect for the value of landscape quality in the people who inhabit and use that place. ie. lifestyle quality must be intrinsic with landscape quality, and ‘progress’ and development of both must be mutual and sustainable.
- Thus, we propose that the theme of community should precede all other management themes. Without success in this theme, the landscape value of the AONB will be neither inherent nor sustainable. The other themes for ‘land, coast and water (or physical environment)’, ‘built and cultural heritage’ (avoiding the tautology ‘historic heritage’), and ‘administration’ are appropriate. All these themes must be approached in terms of sustainability, so the ‘sustainable’ prefix to ‘community’ is misleading and should be removed.
- We are content that the proposed Management Plan does not restrict itself to the three themes of AONB designation (conservation, enjoyment and access). Conservation or protection of a status quo is not a privilege which is available in the management of any landscape. However, it should be possible to strive for and maintain a constant level of value, even in a changing and evolving landscape / lifestyle, and this should be the stated aim of any landscape policy. Landscape value depends on the input and direction of community and not just beauty and amenity, wildlife, historic objects or natural phenomena. Likewise, enjoyment and access must be core to the value of the community lifestyle within that landscape and not aimed primarily at a visiting population.

According to these principles, the Visions and Objectives for the four proposed themes are restated below.

Theme 1: Community

Vision:

1. the users of a certain landscape should be aware of / respect / participate in a thriving local culture
2. prosperity and business enterprise inherent with environmental and landscape benefit is
possible, and is developed

3. culture, enterprise, facilities and services will mutually benefit resident and visitor populations

Objectives:

1. encourage enhanced local and visitor sense of respect and ownership of a distinct local culture
2. stimulate economic prosperity (develop alternative economic prospects) and local culture which maintains the area’s distinct character
3. stimulate a quality visitor experience which is integral with (and supports) the local economy

Supplementary / Explanatory text

• Statutory designations may overlap and confuse. Northern Ireland should confirm and respect the ancient counties, towns and townlands which reflect generations of people and centuries of historic culture of the land. These now overlap with artificial designations applied by policies of the last century. Famed in legend and song, County Antrim (and its County Council) could exist again. This would have multiple advantages from many points of view – identity – tourist interest – sports – cultural development – and not least management of an area of outstanding natural beauty. ’County Antrim’ invokes pride, culture, history and sustainability in a way which “Antrim Coast & Glens AONB” will never be understood.

• Can the knowledge and skills of local people (young and old) be developed and used in survey and research for the information base? If the concept of Young Enterprise companies is accepted, schools and pupils resources could be of assistance and earn money and educational opportunities at the same time. Older local people could volunteer as business advisers to the YE companies and bring assistance and local acceptability to the process.

• Restoration of land and coastline is a costly exercise and there are many failures – where derelict countryside or coastline have been restored but have returned to dereliction in spite of large amounts of public expenditure. Places are only kept up if they provide a perceived benefit to their owners, whether private or public. A garden enjoyed is a garden maintained – an asset. A garden which is not used is a liability – resources are simply not applied to it even if they may be available. Often the communities in the AONB are small – too small to be able to upkeep the large areas of country and coast with which they are blessed. Enabling these areas to pay their way by encouraging the culture to come out and play in them is a real opportunity to attract visitors with money while getting best use. An example is the lakeside on Lago Maggiore in Italy. Here the walkway is intensively managed on a daily basis – steamers come and go, newspapers and coffee are sold, paving is attractive for walking and cycling, vehicles are allowed to travel slowly along at certain times, the hotel is a restored monastery and the covered terrace allows diners to directly overlook the walkway to the lake. In the evening the orchestra on the walkway includes local people of all ages; chairs are brought out to accommodate the audience. The culture is exposed. It draws people from far away to return again and again, spending their money in the village, perpetuating the economic vitality of the area. Small activated communities with “culture exposed and for sale” can be viable. Viability and the use of heritage for cultural and economic benefit are the keys to restoration which follows naturally and affordably. In Action Point 5.9, standing stones, raths and mottes suggest “Stories”! Perhaps the capacity of young and old to spin tales should be harnessed to present these heritage items.

• There is a real local pride in the area’s culture. However, the reverse is the case in expressing this culture to visitors. Travelling to many of the settlements in the designated area, there is no clue for outsiders of a vibrant culture of music, local history, language, song and dance. One may from time to time hear live music in a pub,
for example, but the local books are not in the supermarkets, there is no sign of traditional dance or costume on display…we really hide our light under bushels as far as visitors are concerned. This is an area which requires inspiration if we are to present ourselves to others as we do within our own local communities. The driving force is to find the way in which culture and the enjoyment of culture can be profitable for the local area – in financial terms as well as just enjoyment for its own sake. The skills exist in the local areas and need to be brought out and marketed. What tourist would not wish, for example, to join in a beginners’ class in Irish dancing?

- Stretch the tourism offer in both directions, including both the proposal for hostel type facilities (13.6), but also the highly desirable upper end of the market to which some people aspire and which would bring them to the area. There is strong resistance in some local areas to the artificial imposition of the “Causeway Coastal Route” (13.2) which to local people denies the very existence of the famous “Antrim Coast Road”. If tourists are failing to stop along this ‘designated’ route, is it not because the destination – the Causeway – is identified as a place outside of the area? ‘Causeway and Glens Coastal Route’ might serve to improve the balance. Similarly, the imposition of a “common AONB identity” could be seen to deny the importance of the villages and small settlements themselves.

- Local groups need to be convinced. “AONB” is still an imposed designation which did not grow naturally from the locality. Acceptance and credibility needs to be developed and this will be best done by “deeds not words”. There is a danger that the AONB management is seen as “separate” from the local communities which make up the Glens – just another unelected “quango”. Such management would naturally be through a reborn Antrim County Council as the responsibility of elected members.

Theme 2: Physical Environment (land, water, coast)

Vision:
1. management of the resources is key to the economy and support of the community that is engaged in supporting the area's value.
2. the value of the AONB landscape is protected and enhanced even if the resource will change
3. the landscape of the AONB is valued in all areas
4. ownership and management role in maintaining this value is appreciated by both resident and visitor population
5. there may be a network of ‘protected’ sites within the AONB

Objectives:
1. promote appreciation of AONB values
2. provide information
3. work to improve to a good condition the landscape of all areas (including a network of protected areas)

Supplementary / Explanatory text

- Appreciation and enjoyment need interpretation as noted in Action Point 1.4 – This might be through young people engaging in the place as a business through Young Enterprise companies. The Young Enterprise companies might undertake projects such as explanations to owners (1.1), new access arrangements (1.2 & 1.3) and feature adoption (1.5). Small amounts of money paid to Young Enterprise companies could pay large returns in education, work output and credibility/ownership. In relation to Action Point 1.5, the involvement of Planning Service Officers with local groups to prepare very local plans (Planning for Real) could be proposed as part of Planning Service professional CPD and would help officers to understand local circumstances and culture when considering planning applications.

- Item 4.3 raises the question of roadside verges as “wildlife corridors”. How does this relate to their use as walking, cycling and horse-riding routes? Can such routes and wildlife corridors co-exist? One aspect of providing for sustainable tourism is the
creation of safe and attractive walking / cycling / riding routes integral with local
community use, since traffic on the small roads tends to travel quickly and is off-putting
to walkers, reducing opportunities for sustainability.

Theme 3: Cultural and Built Heritage (ie. heritage includes the verbal, active, non-physical
culture and identity of landscape and lifestyle)

Vision:
1. there will be no further reduction in heritage value in the AONB
2. the value of local cultural and built heritage is appreciated and maintained by good
stewardship, and is actively pursued, developed and enjoyed by resident and visitor
population

Objectives:
1. increase public appreciation of and engagement with heritage value
2. support establishment of a local heritage centre
3. ensure sympathetic conservation and reuse of built heritage

Supplementary / Explanatory text

• “Use and enjoy” might be more descriptive than the heavy “appreciation and
engagement” words. “Use and enjoy” also implies that the heritage itself might help to
make a financial contribution to the area – people are willing to pay for their
enjoyment! Finding more ways to make the heritage pay for itself is the best way to
save it and ensure that it remains viable in future.
• Work creatively to reuse buildings – for example create the proposed office space for
the Glens of Antrim Historical Society in one of these reused buildings and encourage
the society to own the property and rent out a portion as living or work space to keep
the building active and provide a long term income to the Society. Once experienced in
reality, people are keen to invest in similar projects for themselves. Exemplar projects
– particularly those in which someone has made some money – encourage others.
• If designations are used to protect the best of our heritage, then everything which is
undesignated is fair game for developers or profit seeking (i.e. normal) owners. To
“protect and conserve” misses the point. If heritage is “used and enjoyed” it will
provide not only pleasure but also an economic return to its owners. This “use and
enjoy” approach is far more likely to ensure the continuing presence of our heritage
than trying to protect and conserve something owned by someone else and for which
society is unwilling to pay any premium. The skills and crafts are available – they will
follow the demand.
• Should the document mention a proposed cap on the proportion of second homes
permitted in the area?

Theme 4: Administration

Vision:
1. there is a dedicated management structure which is accepted and appreciated by the
community which works to enhance and sustain the value of the AONB
2. there is enhanced credibility in communities (resident and visitor) and stakeholders of the
value of the AONB
3. increased appreciation of AONB value will improve funding support

Objectives:
1. establish appropriate AONB management and implementation body
2. raise awareness and support for the value of the AONB in communities (resident and visitor)
and stakeholders
3. improve funding streams

Supplementary / Explanatory text
• In a headlong rush to “protect”, Government at once reduces economic activity and slows development by an overregulated and indecisive planning system while failing to understand culture and context by the imposition of textbook rules and homogenised policies. The distinctive physical character of the area is being run down by a lack of design capacity in the statutory bodies. I define design as the integration of many (often apparently irreconcilable and contradictory) factors to achieve a satisfactory whole. A simple example is the inability of DRD Roads Service to understand that narrow carriage arches without any visibility splays onto footpaths and streets have worked satisfactorily for generations as means of access to private properties, together with the unwillingness of DoE Planning Service to depart from the statutory consultation advice offered by DRD Roads Service. The “rules” of road design require visibility splays and wide level access and egress points onto streets and footpaths for “safety”. These devices, of course, speed up traffic and have the potential to be less safe than the narrow entrances which keep vehicles moving slowly and carefully to avoid collisions. Yet nobody has told Roads Service this, so they insist on their latest “Roads Manual” standards for each planning application, regardless of the historical and cultural context of the settlement. At Waterfoot, for example, wasteful road layouts in the new developments which are “Roads Manual” textbook examples with mini-roundabouts and other imported devices are completely devoid of the original character of the village. Don’t establish another Housing Association (10.6); instead use the network of existing associations, many of whom would be keen to develop in the area. Build on, assist and develop the existing world famous Lammas Fair at Ballycastle if other fairs are to be envisaged (10.5). Similarly, link with the Four Swans festival at Ballycastle if additional cultural festivals are planned (10.5). Be aware that the THI and LOTS schemes (10.4) involve strict criteria and clawback arrangements which are not automatically attractive to owners. For (10.6) be aware that public sector owners appear to require “market value” for land, making affordable housing difficult to achieve. Consider separating land value and house value with a land rent and house purchase if affordability criteria are to be met.

• Diversity in the rural economy actually has to happen outside of government. Government does not have the imagination to allow new things to happen, particularly in these designated special areas such as AONB. Planning Service must have the foresight to recognise and permit positive local enterprise which adds to the identity, culture and enjoyment of an area. eg. a farm shop and restaurant which has developed by gradual, normal, almost imperceptible change, but potentially contrary to Green Belt / Countryside Area Policy, inadequate access arrangements, insufficient parking, lack of suitable road infrastructure to deal with the numbers of visitors, or requiring environmental impact assessment etc.

• The population of the whole AONB area is very small, hardly more than a couple of city neighbourhoods; travel times by today’s standards are relatively long, tiresome and dangerous because the road infrastructure within the AONB has not really changed since the days of the horse and carriage. This of course creates part of the charm of the area for visitors but creates difficulties in provision of essential services for local residents. Electronic communications and private initiatives (eg. well organised distribution of groceries) have enabled living standards and expectations to rise with minimum adjustment in the physical surroundings. Local economies are not thriving, however, and the introduction of additional efficiencies is required. Simple things like “local lifts” which share resources to collect and deliver already exist and could be further developed. Additionally, councils and other public employers could save money and put resources into local communities by commissioning operational works from people who live in the immediate area rather than employing staff who have to travel within the district. There is a great example of this in Waterfoot, called “Beach Watch”, where local people who walk the beach every day for pleasure also undertake
to replace any missing lifebelts. A small store of lifebelts is kept in a resident’s own house in the village and replenished when the council van comes to do something else. This saves the council running miles from the depot to the beach on each occasion that a lifebelt needs to be replaced, reducing costs and providing a better, safer beach. This technique could be developed as a “social enterprise” offering other similar services very locally, bringing additional resources into the local area and saving money while providing a better service.

- Can the most beautiful areas, such as AONBs, use their beauty to sustain themselves? Can they attract, by their beauty, people who naturally assist the process of protection and enhancement and earn their living there at the same time? Is there scope to consider something along the lines of a “Business Improvement District” where local taxes are invested locally to regenerate the area and thereby improve the businesses which contribute? A concern with simply allocating “jobs” – Managers and Officers – to an area is that the whole thing is vulnerable to the removal of funding at a stroke during a period of financial cuts by government. A “funded” management unit which is separate from the local communities is susceptible to cuts from above. It would be so much better if the area could sustain its own management costs.

Generally:
1. the document is too wordy, and has too many accompanying images. It should be reduced to form a single document.
2. there is confusion and repetition in the document between the sub sections of issues, aims, resources, current action, vision and objectives. It would be sufficient to combine resources with issues, and aims with objectives.
3. the document is of an insufficient standard for a consultation document (seeking confirmation that the frequent plenty of evident inaccuracies in typography and typesetting are not matched by equally frequent inaccuracies in content).

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