

**BALLYMONEY BOROUGH COUNCIL
DEVELOPMENT COMMITTEE**

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BALLYMONEY BOROUGH COUNCIL

DEVELOPMENT COMMITTEE

Minutes of Development Meeting No 224, held in the Council Chamber, Riada House, Ballymoney on Monday 14th March 2011 at 4.00 pm.

IN THE CHAIR: Councillor Finlay

PRESENT:

Aldermen
F Campbell
H Connolly
C Cousley, MBE, Deputy Mayor

Councillors
R Halliday
B Kennedy, Mayor
M McCamphill
I Stevenson, Vice

APOLOGIES: **Aldermen**

Councillors
A Cavlan
T McKeown

IN ATTENDANCE: Chief Executive
Head of Corporate & Development Services
Committee Clerk

224.1 MINUTES – Meeting No 223 – 21st February 2011

It was proposed by Alderman Connolly, seconded by Councillor Stevenson and
AGREED:-

*that the minutes of Meeting No 223 – 21st February 2011, as
circulated, be confirmed as a correct record.*

224.2 RURAL DEVELOPMENT PROGRAMME

2.1 Village Renewal Programme

Council considered at its meeting on 7th March report on applications for contributions towards village action plans, circulated. Committee was invited to review and settle the application from Ballybogey and District Community Association, deferred from Council meeting (Project Report attached as Appendix A). Committee has been granted Council powers for this item.

It was acknowledged that four of the community groups have specifically raised or allocated funds, matched by Council, whilst Ballybogey have applied for big lottery Awards for All funding, as they are unable to provide or raise funding. The result of the application will not be known until the end of March, and then applications could be referred for assessment in June by the Rural Development Programme..

It was proposed by Councillor Kennedy, seconded by Alderman Campbell and **AGREED:-**

to review request for contribution and agree contributions to the Village Renewal Programme, if required, following the Awards for All decision on Ballybogey Community Association application .

An internal audit issue raised regarding the management of community halls and their accounting and booking processes was also discussed. A report on this will be addressed by RTG.

Alderman Cousley entered the meeting during discussions at 4.10pm.

2.2 Drumaheglis Rural Tourism Event

This project was previously withdrawn due to timelines and budget issues, but has been re-developed as a summer event, total cost £10,785, with contribution of £848.75 from Council.

It was proposed by Councillor Kennedy, seconded by Councillor Halliday and **AGREED:-**

to recommend that the project be approved, the cost of £848.75 being met from previous budget.

2.3 Scenic Drives – “Drives of Distinction” Pilot Study

Initial development of a series of scenic drives in the borough has been undertaken with the support of the Access to the Countryside Officer and her contribution is acknowledged. Discussions are ongoing with Roads Services and other relevant agencies. An application has been developed for submission to the Rural Development Programme for a pilot study which has the potential of being rolled out across the region. The pilot project total estimated cost is £6,666.67, with contribution of £1,666.67 from Council.

It was proposed by Alderman Connolly, seconded by Councillor Kennedy and **AGREED:-**

to recommend that the project be approved, the cost of £1666.67 being met from the budget for Bygone Ballymoney project, which has been withdrawn.

Acknowledgment was given to Sonya Crawford, Access Officer, for her input on development of this project.

2.4 Rural Tourism Knowledge

This project is not proceeding as a similar project is being offered via NRC.

224.3 CAUSEWAY CLUSTER ECONOMIC DEVELOPMENT STRATEGY

Further consideration on this matter was deferred from the last meeting.

The Head of Corporate and Development Services gave a presentation on the Causeway Cluster Economic Development Collaboration Strategy and took questions and comments from members. It was indicated that there is no funding allocation for Council to support the action plan, but rather opportunities could be taken to collaborate on projects that Council has already agreed to, and has funding for.

It was proposed by Alderman Campbell, seconded by Alderman Connolly and **AGREED:-**

that the collaboration strategy for the Causeway Cluster local economic development be adopted in principle and utilised to support any Council programmes where there are opportunities for collaborative action.

**Councillor Stevenson left the meeting during discussions at 4.29pm returning at 4.33pm.
Councillor Kennedy left the meeting during discussions at 4.30pm returned at 4.33pm.**

224.4 TOURISM MARKETING/DEVELOPMENT

4.1 Interreg Inland Waterways Project

A request for further information from the consultants evaluating this project has been provided. Revised valuations for the site could not be delivered in the timeframe set.

The Tourism Call is opening and consideration will be given to re-submitting Causeway Connections and Biker Tourism, under the auspices of CCGRTP, possibly as a single project. .

4.2 Review of Regional Tourism Delivery

Arrangements have now been put in place to receive the report from the steering group and for a meeting of Officers in the region with DETI. A report will be brought to Council at its April meeting. Arising from the review of the Causeway Coast and Glens Masterplan, Committee may wish to review its tourism strategy/business plan.

4.3 Familiarisation (FAM) Trips

Causeway Coast & Glens RTP has organised FAM trips for TIC staff in the region, with a focus on key visitor attractions.

4.4 Regional Marketing Initiatives

A range of marketing initiatives is being advanced, including, German tour operator packages for the Causeway Coastal Route; European Campaign “Road Trip of a Lifetime”; Rural Development Campaign; Google Adwords Campaign; Golf product promotion; ROI Spring campaign; Biker tourism. Further development of two key products – myths & legends and biker tourism on the regional website is underway.

4.5 Local Tourism Intelligence Exchange

NITB held a Local Tourism Intelligence Exchange Forum in Ballymoney on 1st March facilitating exchange between the Board, Council and the tourism sector. The topic of the month was “campaigning for tourism” and there were policy updates and review of performance.

The Board shared research and information on the issues that affect tourism and where the opportunities lie. This was an essential aide for decision making. The overarching purpose of this knowledge exchange forum was to make the information more accessible to the sector and to share information and exchange ideas.

4.6 Brown Signs Audit

An annual audit of “brown” tourist direction signs is being conducted and applications from the sector are being processed with the assistance of Roads Service and NI Tourist Board.

Council element of the audit is almost completed and will be passed on to Road Service in due course.

224.5 TOWN MARKETING/DEVELOPMENT

5.1 Traders Forum

The Chamber of Commerce is facilitating a forum to which all town centre businesses have been invited. Issues include crime prevention and plastic bags tax and business marketing/development. A presentation on new IT courses re website development and electronic communications was also given by NRC.

The closure of businesses in the core of the town and the correlation to rising rental and overhead costs was also discussed.

224.6 DEVELOPMENT OPPORTUNITIES

In June of last year committee gave initial consideration to a proposal for re-development of 25 Castle Street, Ballymoney, and requested to Council for right of access over its lands and removal of wall and planters at that location to facilitate a mixed-use development.

Council agreed to dispose of the land in principal, and that a further report be brought to committee when the most appropriate means of obtaining best value has been determined. In the intervening period advice had been sought and meetings have been held with the developer on possible options. It is **recommended** that a concept proposal be further explored and further advice taken as to the best options to comply with Council's decision on the request.

The Chief Executive briefed committee with regards to the proposed development concept put forward by the developer. Committee **AGREED:-**

to recommend that the concept proposal be explored further and advice taken as to the best option to comply with Council's decision on the request.

Councillor Stevenson left the meeting during discussions at 4.52pm returning at 5.04pm

224.7 REGIONAL DEVELOPMENT STRATEGY – “Shaping Our Future” 10 Year Review

This review was tabled at committee's last meeting and committee is invited to give further consideration to this. A draft response prepared by NILGA is attached as Appendix B; a copy of the Executive Summary and Consultations questions circulated. The Chief Executive presented additional comments as set in Appendix D and facilitated discussion to settle Council's response.

It was proposed by Alderman Campbell, seconded by Councillor Kennedy and **AGREED:-**

to recommend that the NILGA response, Appendix B, be adopted together with specific responses to questions 3,9, 10 and 28, which give particular emphasis to Cluster Settlements, their economic viability, and the role each town will play within them, are of particular relevance to Ballymoney Borough Council, Appendix D.

224.8 DRAFT TELECOMMUNICATIONS ACTION PLAN FOR NORTHERN IRELAND 2011-2015 - CONSULTATION

The Department of Enterprise, Trade and Investment has launched a consultation document on a draft Telecommunications Action Plan for the period 2011-2015.

The Action Plan sets out DETI's thoughts on the key priorities and themes to be taken forward over the next 4 years in order to ensure that Northern Ireland continues to have a telecommunications infrastructure that is fit for purpose and capable of supporting the growth of the local economy.

The consultation document (and the accompanying impact assessments) is available to view or download from the Department's website at www.detini.gov.uk/content-home-consultations.

As part of the consultation process, DETI will be hosting a series of public meetings in the weeks commencing 14 and 21 March 2011. Details of the dates and venues will be published in the press in advance of the meetings.

The closing date for receipt of responses to the consultation is 3.00pm on Friday 27 May 2011. It was **AGREED** to defer this matter to the next meeting.

224.9 BALLYMONEY BOROUGH TWINNING ASSOCIATION – REQUEST FOR CONTRIBUTION FOR 2011/12

An application has been received from Ballymoney Borough Twinning Association for a contribution for 2011/12. A copy of their annual report for 2010/11 detailing fund raising activities, visits supported etc was circulated.

It was proposed by Councillor Kennedy, seconded by Councillor McCamphill and **AGREED:-**

to RECOMMEND that a contribution of £4,000 be made to Ballymoney Borough Twinning Association for the year 2010/11.

224.10 DETI FUNDING PACKAGE

The Head of Corporate & Development Services outlined the report, dated March 2011, on the outcome of the financial profiling exercise for the 26 district councils which the LED Forum facilitated on behalf of SOLACE and NILGA. The report covered the key issues, implications for local government, methodology, additional factors for consideration and key themes. A copy of spreadsheet showing contributions by each Council for the period 2011/12 – 2014/15, showing best and worst case scenario was circulated.. It is intended that the report and accompanying figures will be utilised to reassure senior figures within DETI, including Minister Foster, of Local Government's capacity to successfully drawdown the allocation that is currently within the LED measure.

The officer responded to questions from members, noting that the level of funding provided by Council, compared to other authorities in the Cluster and across Northern Ireland was small and the officer had not assumed any additional funding beyond the level of budget in the current year. Further details of the proposed Council projects submitted under the profiling exercise were given. It was **agreed** that committee review economic development plan and funding requirements for the period to 2015 at a future meeting.

During discussion Alderman Campbell left at 5.19pm, returning at 5.22pm, Alderman Cousley left the meeting at 5.13pm.

224.11 CONSULTATION ON DEVELOPMENT OF HIGHER EDUCATION STRATEGY FOR NORTHERN IRELAND

It was noted that representatives from the University of Ulster who had attended committees last meeting had suggested that Committee may wish to consider a response to this consultation. A copy of the consultation response questionnaire was circulated to members. The deadline for responses was 15th April 2011.

During discussion members acknowledged that third level education was important and with the aspirations for a knowledge based economy it was a challenge for Northern Ireland to develop the third level education sector the way it needed to.

It was proposed by Councillor Kennedy, seconded by Councillor McCamphill and **AGREED:-**

To recommend that Council endorse the importance of development of third level education to the future of the Northern Ireland economy.

224.12 NORTHERN AREA PLAN

Public Examination on the Northern Area Plan is to be held in the Town Hall Auditorium on 19th September 2011. Interested parties are invited to an information evening on Tuesday 3rd May at 6.30pm. Arrangements will be made for further discussions with Council's planning consultant.

The meeting closed at 5.23pm

- Appendix A Project Report – Village Renewal Programme
- Appendix B NILGA Draft Response to the DRDNI Consultation Document on the Review of the Regional Development Strategy 2011
- Appendix C Comments on RDS 2025, 10 Year Review Consultation

RURAL DEVELOPMENT – VILLAGE RENEWAL PROGRAMME

Community Association	Village Plan Tender. £.	RDP Grant. £.	CA Contribution £.	BBC Contribution £.
Dervock & District Community Association	5940.00	4455.00	745.00	740.00
Stranocum & District Community Association	4425.00	3318.75	556.25	550.00
Dunloy Development Association	*6000.00	4500.00	750.00	750.00
Rasharkin Community Association	*2500.00	1875.00	425.00	200.00
Ballybogey & District Community Association	*7000.00	5250.00	1750.00**	<i>DC to review</i>

*- Estimates (contribution to be revised when tender amount and letter of offer confirmed.)

** - Big Lottery Awards for All (awaiting confirmation)

Prices include VAT

Budget provision for the contributions is available in 2011/12 estimate.



**NILGA DRAFT response to the
DRDNI Consultation Document on the Review of the Regional Development Strategy
2011**

The following is the NILGA draft response to the consultation document published by the Department in January 2011 and requiring response by 31st March 2011. This paper was drafted following a consultation event held in Antrim on 1st March 2011 and will be considered by the NILGA Executive Committee on 11th March 2011.

A commitment was given in the 2001 Regional Development Strategy (RDS) to carry out a review after 10 years. This consultation considers the Department's review proposals to address the changing policy context, the key changes including the introduction of new concepts, such as sub-regional centres, clusters and a new approach to housing growth indicators. The RDS has a significant impact on councils and their development potential, and NILGA would therefore encourage all councils to respond robustly to this consultation.

For further information or to discuss any of the issues highlighted, please contact Karen Smyth at the NILGA Offices:

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Tel: 028 9079 8972

INTRODUCTION

NILGA, the Northern Ireland Local Government Association, is the representative body for district councils in Northern Ireland. NILGA represents and promotes the interests of local authorities and is supported by all the main political parties. Planning and regional development are key issues for local government due to the huge impact they have on the shaping of local communities, the economy, and sustainability. NILGA is pleased to be able to have an opportunity to comment on the proposals for the review of the regional Development Strategy and we trust that our comments will be taken into account when developing the final proposals.

This response was developed in liaison with the NILGA Planning Working Group and SOLACE.

The Department has issued a list of 29 questions, many of which are inappropriate for NILGA to answer. This draft response, therefore, whilst not answering each question directly, approximately follows the key themes as set out within the consultation.

BACKGROUND

The Regional Development Strategy is central to the future abilities of councils to regenerate and develop their areas, laying out the critical infrastructure and setting the framework for the system of local area plans that we are currently working on, and the development plans that we will be charged with creating in future.

We need a Strategy to help councils develop and invest in sustainable communities that are future-proofed against social environmental and economic challenge, and which will govern how we can invest locally.

It is critical that the Department's aim of working towards the creation of balanced communities, with provision of a range of housing types and tenures supported by local employment, open space, community facilities and local services integrates well with council-led place-shaping.

Place-shaping is a key role for local government, and it is the overarching Regional Development Strategy that steers how we can improve the quality of life for all our citizens.

The review of this Strategy has caused great concern for many councils due to the fundamental change of emphasis within the spatial framework.

It is therefore critically important for local government to influence the development of and to change policies that we will eventually be expected to implement, and we would welcome ongoing engagement with the Department to achieve an agreed and appropriate outcome.

NILGA is supportive of the Department's aim to ensure that the RDS is cross-cutting and that it integrates with other government policy and the current policy context. We note that the Strategy recognises the important relationship between physical development and the economic, social and environmental pillars of sustainable development, and also the importance of key infrastructure such as that for energy, transport and telecommunications. We would value a stronger link to economic, transport, tourism and rural strategy and policy in particular, and believe that more work is required to ensure satisfactory policy integration.

Local government is universally and deeply concerned by the impact the current economic crisis is having on our communities and businesses, and we note that the need to integrate with economic policy and the urgent need to grow the private sector is recognised. We would value a stronger link to economic, transport, tourism and rural strategy and policy in particular, and believe that more work is required to ensure satisfactory policy integration.

We note that waste management infrastructure is still identified as regionally significant, and comment further on this issue on page 5.

KEY ISSUES

Further to conversations with key local government staff and members, culminating in a policy consultation event held in Antrim on 1st March 2011, a number of key strategic concerns have been identified, most of which stem from the fundamental change in emphasis and direction in what is an agreed long term strategy.

Lack of sufficient consultation

This is a major review of the RDS signalling a new direction for the policy and due to this change in emphasis, the view has been expressed to NILGA that a standard 12 week consultation is insufficient. In view of comments presented to it NILGA would therefore encourage the Department to consider instigating a public inquiry as part of the review process. Given that the consultation is due to finish during the 'purdah' period, and that the policy recommendations will be taken forward by the incoming Minister, we believe that there is time available to ensure a robust, agreed and appropriate strategy.

Spatial Framework and Strategic Guidance

The significant changes to the Spatial Framework pose a number of serious concerns for many councils:

- **Change from main and local hubs to sub-regional and main centres**

A number of councils are seriously concerned at these changes, in particular those believing they have not been properly recognised within the review. Conversations with affected councils are urgently needed on this issue. NILGA would strongly encourage the Department to ensure the Strategy continues to be clearly linked to transport and economic policy, going forward.

We also note the point made by the Department at the event on 1st March that some hubs previously identified by the Strategy have not performed as well as had been hoped. NILGA

would recommend that the Department research the reasons for this, rather than accepting this underperformance as a fait accompli. It has been pointed out to us that this underperformance has in some cases been due to the mis-application of the RDS by other government departments.

- **Clusters**

NILGA, councils and the Department of the Environment are continuing to work towards the development of a reformed local government system. The size and boundaries of councils will be changed, once implemented. As part of this policy, councils are being encouraged to work in clusters to develop integrated working arrangements for what will be the new larger areas.

It is noted that the department has made reference to this work and has proposed a number of clusters for cooperation between identified centres. It is also noted that no clusters have been identified in the West.

NILGA is keen to ensure that proposals made by the Department do not impact on the flexibility of council development at a later stage. It is our view that when a policy proposal is set in the Regional Development Strategy, other government departments can take a less than flexible approach to implementation, and that this is likely to result in council hands being tied further down the line, which may not be the Department's intention.

We would therefore draw your attention to the Improvement Collaboration and Efficiency (ICE) programme currently being developed by local government, with the aim of developing a flexible approach to working together on shared back office and front-facing services. The 'Case for Change report' on this programme is currently out for consultation with councils, and the aims and objectives are outlined in Appendix 1. ICE is hugely relevant to the real 'on the ground' linkages between council areas, and effective implementation of ICE will allow councils to work more fluidly and to integrate with demonstrable economic and transport corridors.

NILGA would encourage the Department to communicate with councils at an early stage to examine what existing economic and development clustering is already in place, and to look at potential future links.

- **Corridors**

It is noted that the link between transport gateways and hubs has not been properly recognised in some cases, and we would urge the Department to re-examine this issue and also to look at East-West links, as well as the North-South corridors.

- **Belfast Metropolitan Urban Area**

NILGA is supportive of the need for Belfast to be a key regional economic driver, but we would encourage the Department to work towards achieving an appropriate balance, to ensure that the strengthening of Belfast does not impact negatively on other areas.

We are also keen to ensure that the strengthening of Belfast does not weaken the environmental aspects of transport policy due to increased commuting and congestion.

- **Derry City Hub of the North West**

NILGA has received some views from councils in the Northern West, indicating that there should be consistency in the policies and guidance for the BMUA and the North West. NILGA would strongly encourage further communication between the Department and the councils in the North West.

- **Cross-border linkages**

Views have been expressed to NILGA regarding a more substantive identification and clustering of cross-border linkages in addition to that identified for Newry-Dundalk. An additional potential

corridor has also been identified between Enniskillen and Dublin. NILGA would therefore encourage the Department to communicate with the appropriate councils on this issue.

- **The Rural Area**

There is a strong view emerging from rural councils that the Strategy Review has not adequately considered rural areas or rural development policy and strategy. For vibrant rural communities to exist, population centres are required, with commercial and industrial development and active growth facilitated.

NILGA is concerned that there is insufficient integration with the forthcoming rural white paper. The Department must recognise the different challenges that rural areas face, and that regional planning policy is often not a comfortable solution due to the Northern Ireland rural/urban split.

The references to social deprivation within the review focus on urban areas, which is a particular concern given the high figures for rural social deprivation in the West.

Rural areas are keen to ensure they are sufficiently supported through a government commitment to develop rural transport and telecommunications infrastructure, including broadband.

Regionally Significant Economic Infrastructure

In terms of waste infrastructure, NILGA would encourage a greater alignment to the Programme for Government in particular to facilitate issues such as sustainable and economic development in the context of waste planning issues. We would further encourage the integration of waste policy with energy in recognition of the valuable contribution that waste as a resource can make to the energy/renewable energy agenda in terms of security and diversity of supply in Northern Ireland.

NILGA would further seek to see the integration of waste policies relating to streams such as, inter alia agricultural, commercial, industrial, wastewater and municipal to ensure that regional infrastructure needs are considered in a rationalised and consolidated way rather than in individual “silos”.

Furthermore we consider that the review of the RDS allows the opportunity to revisit the potential to integrate land-use and waste management planning, for example, in the context of identifying areas of search or zones for regionally significant waste management facilities in a land-use context.

We would also raise the issue of delivery of potentially contentious infrastructure such as waste in the current policy landscape in Northern Ireland particularly in respect to the tension between regional need and local impact from a planning perspective. We would refer in particular to the post Barker planning review in GB, which recognised the need for government to give firm direction in relation to regionally significant infrastructure through the paradigm of Statements of Need/National Planning Policy Statements. In our view these serve to escalate the debate on need to a strategic level. We believe such a perspective in Northern Ireland may serve to provide a more visible and predictable policy landscape to potential developers and investors to the benefit of the environment and economy in Northern Ireland.

Finally, we note the GB debate on the Big Society and the Localism Bill in the context of devolved planning function and the potential for this to affect regional infrastructure delivery and dilute a regional approach to planning. We would seek to ensure that this is not replicated in Northern Ireland and that, rather, the importance of regional development plans is reinforced.

Implementation

NILGA would strongly encourage increased co-ordination between government departments on strategic issues such as regional planning, and would further encourage the development of an effective partnership relationship between central and local government, given the key place-shaping and delivery role of councils, which could be cost effectively realised through NILGA.

We would encourage a flexible approach to clustering, to allow councils to add more value 'on the ground', but this must be balanced with more prescription in the consideration of regionally significant infrastructure.

NILGA is keen to ensure that there is good communication between councils and the Department on the further development of this draft Strategy review, and continuing into the implementation phase. We are committed to ensuring that the voice of councils is heard and we are more than willing to liaise with councils and the department to develop an agreed and appropriate engagement mechanism.

4th March 2011

Appendix 1: Aims and Objectives of the 'Case for Change' Report (ICE Programme)

The 'Case for Change' is the **first step** along the road of a longer term improvement journey.

The report aims to:

- Present a vision for the future of local government within Northern Ireland, a vision which includes closer collaboration between councils and partnership working with other public sector bodies.
- Present the 'Case for Change', identifying the potential scope of opportunities for improvement, collaboration and efficiency across the sector in the context of an increasingly challenging economic climate and the potential transfer of functions from central government.
- Present the ICE Framework which it is believed will support long term improvement, collaboration and efficiency within and across councils.
- Identify the Governance arrangements required to take forward and support the programme.
- Present a Route Map and initial Project Plan for progressing the work required.
- Establish the potential range of efficiency savings achievable through the ICE programme and recognise that these are not directly comparable to the estimated RPA Net Present Cost (NPC) saving of £438m as estimated in an economic appraisal carried out by PwC in the context of RPA and on the basis of an 11 council model.
- Encourage the sector to engage in the ICE programme, therefore demonstrating to the Minister for the Environment that local government is committed to delivering real improvements for its citizens, including the adoption of regional and sub- regional collaborative arrangements.

The report does not consider all service delivery and support areas within councils, nor does it consider the cost of democracy. All areas will however be given full consideration through the longer term ICE programme.

The report seeks to outline the potential scope that exists for improvement, collaboration and efficiency across local government, to prompt further thinking and to encourage more active engagement across the sector through the future development of individual business cases via the longer term ICE programme.

Suggested comments on RDS 2025, 10 Year Review Consultation

The review should be welcomed as should the recognition that there is a need to learn from the lessons of the last 10 years and plan for regional development is a different way to reflect the changed political and economic landscape which now exists in Northern Ireland.

29 questions are asked in the document – not all questions have been responded to as these comments are from a Ballymoney council perspective.

Question 3 Do you consider alternative 4 is the most appropriate? If not what option do you consider more appropriate and why?

Alternative 4 is defined as “Promote development in Belfast, Derry and in identified clusters of key settlements”. For Ballymoney this would mean that Coleraine, classed as a Sub Regional Centre in a cluster of 3 towns with Ballymoney and Moyle classed as Main Centres, would be prioritised for housing and economic growth.

Alternative 3 would seem to better accommodate the natural growth trend in Ballymoney – “Promote development in Belfast and Derry and allow natural growth elsewhere”. The document shows that the Borough’s rate of population growth was over 8% from 2001-09 and is projected to be over 20% from 2008-23. This growth is in the highest of the four bands listed in both time-spans and is greater than others in the Causeway Coast & Glens cluster. If this population growth is not allowed to be accompanied by economic growth, there is a risk that increased commuting will adversely affect the target to reduce carbon emissions.

If alternative four is to be adopted it should give sufficient flexibility to allow for growth to occur within the cluster in a natural way, so that opportunities are not lost to the overall cluster.

Question 9 Do you think that the concept of clustering cities and towns will enable greater economic prosperity and delivery of services. If not, why not?

The concept of clusters is that they represent “a strong network of cities and towns with a high degree of overlap reinforcing the need for places to co-operate rather than compete.” The theory sounds attractive in that neighbouring towns can collaborate to build critical mass to attract investment and development which they could not do on their own. However, it is not clear how this theory would be put into effect and the council would ask that the document in its final form addresses this issue.

Question 10 Do you agree with the cities and towns which have been clustered together? If not what would you cluster together and why?

The cluster including Ballymoney also encompasses Coleraine and Ballycastle. Despite Limavady being: a similar distance from the sub regional centre (Coleraine) as Moyle; in the RPA cluster with the other three; within the North East area plan, which is a daughter document to the regional plan, it is not included in the cluster. This seems to be another example of a failure of joined-up government and the matter should be reconsidered.

Question 28 What are your views on how the strategy will be implemented and monitored?

Implementation and monitoring are essential elements of the strategy and the proposals seem acceptable for the current planning regime. When development control and plan functions are transferred to councils, and during the preceding pilot stages, it will be important that a mechanism is provided for local government input to the Liaison Group and perhaps the Inter-departmental Steering Group.