From: Rathlin Development & Community Association < rdcaoffice@gmail.com >

**Sent:** 20 December 2024 11:07

**Subject:** Survey on parking charges

Hello,

Re: Causeway Coast & Glens Borough Council survey on proposed introduction of car park charges at car parks in Ballycastle.

The consultation period on the proposals for car parking charges closes today. We welcomed the agreement to rescind earlier proposals and to return to the constituency for a consultation.

I have responded to the online survey in a personal capacity as a Ballycastle resident in full-time employment on Rathlin Island, also on behalf of the Rathlin Development & Community Association. I know several other islanders have also responded.

However, in both capacities, personally and on behalf of the island community, we have found the survey to be considerably less than satisfactory and expressions have been made to me to that effect. I list at least some of our concerns:

- The online form is not user-friendly, especially for residents who wish to go further than ticking boxes and want to present their legitimate and well-reasoned concerns over the changes proposed. The comment boxes are restricted to 1000 characters.
- Differences between options given are not highlighted or clearly presented, leading to easy confusion and frustration.
- No opportunity to "save and return later". Anyone wanting to make careful representation of their concerns will want to use the comment boxes and the process of fairly completing the survey may then take much more commitment than the "simple" survey may seem to require.
- The options given are limited. There is no option to remain with the current situation. Merely disagreeing with the 6 options presented is not helpful for anyone in the process and shows no sign of taking residents seriously when some may also have practical suggestions to offer for management of parking in the seafront and harbour areas in question. There is no positive invitation for alternatives or to engage in any more creative way with the affected residents, businesses, users, and visitors to the area.
- The options provided were not fairly designed with input from the communities
  and users affected and do not reflect the range of strongly expressed concerns
  presented that led to the rescinding of the original motion. The format presents
  an extremely limiting survey, protective of the proposals made and manoeuvring
  towards solutions that are still likely to leave many people dissatisfied. It will not

- be a robust consultation process unless it moves beyond merely inviting comment on the restricted options presented and fully considers alternatives that do not already appear in the boxes.
- In limiting the 6 options to being placed in order of preference, the only alternative is to click the 7th option, disagreeing with all. It is then not clear if the remaining 6 will still be counted in order of preference (they stay in their order on the form) or if they are then discarded. By that point, the comment box is not likely to generate positive solutions.
- The monitoring page is clearly not applicable for organisations and again suggests the survey was produced without due care and attention.
- Alternative formats of the survey were "available on request". Unfortunately, there is already a general feeling that one from the given options will be implemented irrespective of any responses on a survey, making it less attractive to request an alternative option.

A deeper, carefully designed and honestly entered grassroots listening process within the Borough may help to recover some of the local confidence that is invaluable if the Council is to function better for all its constituents.

The above points refer particularly to the survey itself. The following points were made in our communication in March 2024. They are included here as they do not seem to have been considered in the design of the options that were subsequently offered for comment.

"Rathlin residents (as well as the need for consideration of individual residents) are equally concerned by the potential implications for other ferry users, including, though not exclusive to the following:

family members of residents, some with caring responsibilities, and all essential for lessening the negative impacts on wellbeing of social exclusion and isolation workers carrying out domestic, business and infrastructure service and developments current social housing construction teams

essential ongoing services (eg part-time or temporary health professionals) regular teams engaged in the major LIFE Raft biodiversity programme, a unique internationally significant 5-year programme in which CCGBC is a partner organisation working partners from other major projects developing innovative opportunities for the island's long-term sustainability (eg Future Island-Island project) overnight visitors availing of island accommodation day visitors and opportunistic travellers

Parking fees at the ferry terminal will be experienced as a surcharge on already increasing costs of island services (and accommodation) - increased ferry tariffs, increase entry charges for RSPB West Light Visitor Centre, etc., all of which add risk to visitor numbers at a time when Tourism NI, Great Lighthouses of Ireland, LIFE Raft, RDCA, Future Island-Island, Northern Ireland Science Festival, and others, together with island business and accommodation providers, are committed to strengthening opportunities for the island's socioeconomic sustainability.

The economic impact of this will be on the island and its community. Extra costs for work on, or visits to the island will either be passed on directly to islanders or make opportunity for such work and visitor traffic less likely. Those who continue through the extra costs entailed in reaching the island will be likely to reconsider and reduce their destination spend, having a direct impact on island businesses.

Dfl's Concessionary Fares Scheme applies to ferry travel to and from Rathlin. Encouragement to avail of this scheme has meant an increase in visitors travelling on Smart Passes. This brings significant additional spend in island outlets. It also increases revenue for the ferry service. Adding ferry car parking fees may impact on the likelihood or regularity of such visits, reducing ferry income and income for businesses on the island, with consequential implications.

Whatever revenue a new scheme may bring for CCGBC, an unfair burden of this revenue will be placed firmly on the shoulders of Rathlin residents.

### Rathlin environment:

We urge CCGBC to consider the impact and added risk that the implementation of parking fees in Rathlin's Ballycastle gateway will bring to Rathlin's environment. Ferry car parking fees, if applied to Rathlin traffic of any kind, may mean it becomes more economically attractive to take vehicles onto the island rather than leave them at the point of embarkation.

The island's infrastructure is not capable of supporting the potential increase in road traffic. Related concerns about island roads have been raised with Dfl and with Council on previous occasions. The limit to increased traffic will then be due to ferry capacity and the ferry booking system. This is likely to have an immediate impact on the flow of vital island traffic, that of residents, service providers, and work vehicles, as well as a risk for emergency services. The resulting associated frustrations and inconveniences will apply to all concerned, including visitors, and make travel to the island even more of a barrier for all concerned. The socioeconomic implications of this for the island should not need to be further detailed here.

There is already no legal framework provision made to restrict traffic flow to the island. This is done by the cost of travel, and the explanations provided in response to would-be vehicle bookings regarding the narrow roads, road conditions, lack of onisland parking, and the many actual and potential environmental impacts of increased traffic. Rathlin Island is made up of a number of rare habitats, plant and animal species which are protected and managed under the various statutory designations. Rathlin's environment is in a fragile balance and increased road traffic will bring added threat to its vulnerability.

"Rathlin is unique in terms of its wildlife and landscape; its natural, built and marine environments all need conservation and stewardship. The environment is of immense value to the people who live and work there and to those who visit the island for recreation. Opportunities exist to develop Rathlin's environmental attributes in a sustainable manner and as an economic driver for the community." (Action Plan pg.22)

## Rathlin and its neighbours:

We are also concerned at potential damage to the social fabric between islanders and the businesses and residents in the Ballycastle harbour and marina area on whom the island community historically relies for some service provision and support. If necessary concessions were made for Rathlin residents without due consideration for other Ballycastle seafront residents, businesses and marina users, it would be at least insensitive and unhelpful, and is more likely to be counterproductive and conflictive. Conflict within communities is already too easy to come by. In this case, the social tension and division would not be due to any action or inaction of either affected party but rather to actions implemented by the Council duty bound to serve its constituents with equity and sensitivity.

For this reason, we consider that proposals for implementation of parking fees for the ferry car park and some concessionary scheme appropriately examined with affected parties, should also contemplate a favourable scheme for our nearest neighbours on the mainland, with whom we share due concern." (March 2024)

Can you please assure us that all the points above will be taken into consideration when Council and its consultants deliberate on the results of the parking charges survey and any resulting proposals?

Many thanks.

Kind regards,

Rathlin Development & Community Association The Resource Centre Rathlin Island Co. Antrim BT54 6RT

www.rathlincommunity.org