

Planning Committee Report LA01/2018/0040/F	25th September 2019
PLANNING COMMITTEE	

Linkage to Council Strategy (2015-19)	
Strategic Theme	Protecting and Enhancing our Environment and Assets
Outcome	Pro-active decision making which protects the natural features, characteristics and integrity of the Borough
Lead Officer	Development Management & Enforcement Manager
Cost: (If applicable)	N/A

<u>No:</u> LA01/2018/0040/F	<u>Ward:</u> Giant's Causeway
<u>App Type:</u> Full Planning	
<u>Address:</u> Lands at Stanalane to West and South of Dunluce School, 16 Dunluce Road, Bushmills	
<u>Proposal:</u> Proposed Holiday Park comprising mobile homes and touring pitches with new reception and administrative building and associated landscaping and access works	
<u>Con Area:</u> N/A	<u>Valid Date:</u> 29.01.2018
<u>Listed Building Grade:</u> N/A	
Agent: Donaldson Planning Limited, 50A High Street, Holywood, BT18 9AE	
Applicant: Portnaboe Ltd, The Old Barn, 6 Seaport Avenue, Portballintrae	
Objections: 10	Petitions of Objection: 0
Support: 1	Petitions of Support: 0

Executive Summary

- This proposal is considered acceptable at this location having regard to the Northern Area Plan 2016 and all other material considerations.
- The location, siting, size, design and layout of the holiday park is acceptable and does not adversely impact the surrounding landscape, rural character and site context.
- The holiday park does not adversely impact neighbouring residential amenity.
- Although development is proposed within the LLPA within the Causeway Coast AONB, it is not considered to undermine the open character of this area and development is not prohibited.
- Flooding and drainage have been considered with issues resolved in terms of limiting the amount of culverting.
- There are no adverse impacts upon archaeology, listed buildings and natural heritage.
- Access and parking arrangements are acceptable.
- There have been 10 objections received to this application and no statutory consultee have raised any concerns with the proposal.
- The proposal complies with all relevant planning policies including the Northern Area Plan, SPPS, PPS 2, PPS 3, PPS 6, PPS 15, PPS 16 and PPS 21.

Drawings and additional information are available to view on the Planning Portal- www.planningni.gov.uk

1 Recommendation

- 1.1 That the Committee has taken into consideration and agrees with the reasons for the recommendation set out in section 9 and the policies and guidance in sections 7 and 8 and resolves to **APPROVE** planning permission subject to the conditions set out in section 10.

2 SITE LOCATION & DESCRIPTION

- 2.1 The site is located on the southern side of the A2 Dunluce Road, about 250m from its junction with Ballaghmore Road. The site is to the west and south of the playing pitch associated with Dunluce Secondary School. The site is irregular in shape and is approx. 8.3 hectares in size. The site is boggy grassland, used as rough pasture, with intermittent hedges which divide the site into smaller fields. Levels vary throughout the site but there is a steep rise along the southern boundary. A densely planted scarp slope is located to the rear of the site along the south western boundary. A watercourse runs along the site boundary with the school playing pitches. Access to the site is gained through a field gate from Dunluce Road and this access runs parallel with the playing fields adjacent.
- 2.2 The site is approx. 600m from Bushmills Village centre and approx. 250m from the tramway halt which connects to the Giant's Causeway. Dunluce Secondary School and grounds are located north and east of the site. North of the site and on the southern side of Dunluce road are derelict stone buildings. Planning permission has been granted for 1 replacement dwelling and the conversion of two buildings to dwellings under reference C/2015/0130/F. South of the site are two residential properties Nos. 3 & 5 Craigaboney Road, Bushmills.
- 2.3 The site is outside the settlement development limit of Bushmills as defined in the Northern Area Plan 2016. The site is within Montalto Local Landscape Policy Area (Designation BSL 01)

and the entire area is within the Causeway Coast Area of Outstanding Natural Beauty.

3 RELEVANT HISTORY

- 3.1 LA01/2017/0041/PAD: Lands at Stanalane, West and South of Dunluce School, 16 Dunluce Road, Bushmills: Proposed holiday park comprising mobile homes and touring pitches with new reception and administrative building and associated landscaping and access works: PAD concluded - 19/04/2017
- 3.2 LA01/2017/0040/PAN: Lands at Stanalane, to West and South of Dunluce School, 16 Dunluce Road, Bushmills: Proposed holiday park comprising mobile homes and touring and touring pitches with new reception and administrative building and associated landscaping and access works: PAN Acceptable - 25.01.2017
- 3.3 C/2015/0130/F: Lands adjacent to the West Boundary of Dunluce Secondary School, Dunluce Road, Bushmills: Proposed 1 No. replacement dwelling and 2 No. dwellings reusing existing vernacular building, renewal of previous planning permission C/2009/0487/F: Approval - 21.09.2015

4 THE APPLICATION

- 4.1 The scheme is for full permission for a Holiday Park comprising mobile homes and touring pitches with new reception and administrative building and associated landscaping and access works.
- 4.2 The proposal is to create a holiday park consisting of 100 caravan pitches, touring vans, 3 recreational pitches and a reception/amenity building. Access to the site is from the Dunluce Road with a car parking area surrounding the reception building. The recreational pitches and touring van area is located south west of the reception building. Caravans are dispersed throughout the remainder of the site in clusters.

Design & Access Statement

- 4.3 A Design & Access Statement is required under Article 6 of the Planning (General Development Procedure) Order (NI) 2015 as the application is classified as major.
- 4.4 The design and access statement provides details of the design principles and concepts that have been applied to the development and how issues relating to access to the development have been dealt with.
- 4.5 The report date received on 14th December 2017 demonstrates that the applicant undertook detailed consideration of the proposal in terms of the design principles and concepts in relation to the location of the caravan pitches, the proposed design and the impact on the character of the immediate context. Proposed landscaping, layout and servicing were also key considerations.

Environmental Impact Assessment

- 4.6 This proposal was subject to an environmental impact assessment screening as highlighted by, The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.
- 4.7 The application is considered to fall within Schedule 2: Category 12(e) of the Regulations- Permanent camp sites and caravan sites. The threshold for this development is where it exceeds 1 hectare. As the site area measures approx. 8.3 hectares this threshold is exceeded.
- 4.8 Having considered the Regulations and the guidance set out in DCAN 10, the development proposal would not have any likely impacts of such a significance to warrant submission of an environmental statement.

5 PUBLICITY & CONSULTATIONS

5.1 External:

Ten (10) letters of objections have been received in relation to this application. The main issues raised are summarized below and will be considered and assessed in the remainder of this report:

- Drainage concerns due to past flooding between the land within the application site and the adjoining school
- Boundary alterations must be safe and secure to ensure security of children within School.
- Education Authority does not have funding to erect ball stop fence if future disturbance is caused to the caravan park
- Inappropriate location beside a school as children should be safe guarded from overlooking
- Impact upon souterrains related to Dunluce Castle – Archaeology concerns
- Impact upon wildlife including birds, badgers
- Volume of traffic
- Impact upon road safety
- Sewage treatment
- Visual impact upon character and appearance of area – caravans should be hidden from view
- No need for this caravan park as Ballyness Caravan Park has been recently extended in Bushmills
- Development will hinder future tourism development
- Impact of 'trailer parks' on Bushmills
- Antisocial behaviour
- Impact on telecommunications

One (1) letter of support has been received from the Bushmills Trust in relation to this planning application.

5.2 Internal:

NI Water: No objections

DFI Roads: No objections subject to PSD sign off.

Environmental Health: No objections

Shared Environment Services: No objections

Historic Environment Division- Historic Monuments: No objections

Historic Environment Division- Historic Buildings: No objections

Rivers Agency: No objections

DAERA: Water Management Unit: No objections

DAERA: Natural Environment Division: No objections

Proposal of Application Notice

- 5.3 As this application is considered major it must comply with the Proposal of Application Notice and carry out community consultation at least 12 weeks prior to the submission of the application.
- 5.4 A Proposal of Application Notice was submitted on 11th January 2017 under LA01/2017/0040/PAN. The applicant advised that they intended to undertake the following forms of consultation:
- Press advertisement of the public event in Coleraine Chronicle.
 - Leaflet drop to all properties within 200m of the development.
 - Emailed information to MLAs, Councillors and statutory bodies.
 - An email address was set up for correspondence and questionnaires were provided with the leaflet drop and at the public display.
- 5.5 The public event was held on 26th January 2017 in Main Street, Bushmills.

Community Consultation Report

- 5.6 The community consultation report (CCR) was submitted as part of the planning application, received on 14th December 2017 which is more than 12 weeks after the Proposal of Application Notice was received, as required by the legislation.
- 5.7 It contained the methods of consultation carried out and the comments and feedback from this exercise. The report demonstrates that the consultation was carried out as agreed in the Proposal of Application Notice.
- 5.8 A total of 9 questionnaires were completed. Many agreed that Bushmills will benefit from improved tourism and leisure facilities. Others supported the development will be beneficial to tourism and the economy of Bushmills and surrounding area. However, specific comments received are summarised below:
- Hotels are welcome but not caravan parks
 - Caravans are too close to the scenic coast
 - Caravan parks contribute little to the local economy
 - Additional planting should be provided along site boundaries
 - School should be protected from overlooking
 - Visual impact from elevated site
 - Traffic safety
 - Noise pollution
- For full details refer to paragraph 4.3 of the CCR.
- 5.9 Following the community consultation exercise, the applicant carried out further environmental studies to ensure that any impact upon the local environment will be mitigated as far as possible. A Landscape Visual Impact Assessment has been completed.
- 5.10 The CCR demonstrates that adequate community consultation has taken place and the key issues of concern have been considered.

6 MATERIAL CONSIDERATIONS

- 6.1 Section 45(1) of the Planning Act (Northern Ireland) 2011 requires that all applications must have regard to the local development plan, so far as material to the application, and all other material considerations. Section 6(4) states that in making any determination where regard is to be had to the local development plan, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

- 6.2 The development plan is the Northern Area Plan 2016 (NAP) and the site falls outside the settlement limit of Bushmills. The site is located in Montalto Local Landscape Policy Area (BSL 01) and the Causeway Coast Area of Outstanding Natural Beauty.
- 6.3 The Regional Development Strategy (RDS) is a material consideration.
- 6.4 The Strategic Planning Policy Statement for Northern Ireland (SPPS) is a material consideration. As set out in the SPPS, until such times as a new local plan strategy is adopted, councils will apply specified retained operational policies.
- 6.5 Due weight should be given to the relevant policies in the development plan.
- 6.6 All material considerations and any policy conflicts are identified in the “Considerations and Assessment” section of the report.

7 RELEVANT POLICIES & GUIDANCE

Northern Area Plan 2016

Strategic Planning Policy Statement (SPPS) 2015

Planning Policy Statement 2: Natural Heritage

Planning Policy Statement 3: Access Movement and Parking

Planning Policy Statement 6: Planning Archaeology and the Built Heritage

Revised Planning Policy Statement 15: Planning and Flood Risk

Planning Policy Statement 16: Tourism

Planning Policy Statement 21: Sustainable Development in the Countryside

Supplementary Planning Guidance

DCAN 15 – Vehicular Access Standards

8 CONSIDERATIONS & ASSESSMENT

- 8.1 The main considerations in the determination of this application relate to planning policy, impact on LLPA, tourism, visual impact & rural character, flooding, archaeology, listed buildings, access & parking and natural heritage.

Planning Policy

- 8.2 The RDS promotes a sustainable approach to the provision of tourism infrastructure. The principle of development proposed must be considered having regard to the Northern Area Plan 2016 (NAP), the SPPS and relevant Planning Policy Statements specified above.
- 8.3 NAP does not have any specific policy on Tourism. However, it states on page 17 that “Tourism related development consistent with the principles of sustainable development and the protection of the Northern Plan Area’s finest landscapes will be provided in line with regional planning policies”.
- 8.4 Paragraph 6.255 states that the aim of the SPPS in relation to tourism development is to manage the provision of sustainable and high quality tourism developments in appropriate locations within the built and natural environment.
- 8.5 The SPPS also states that for acceptable tourist development in the countryside a new or extended holiday park must be a high quality and sustainable form of tourism development. A positive approach should be adopted in determining applications for tourism development so long as proposals are sustainable, are in accordance with the LDP, and will result in high quality forms of development. Important considerations will include whether the nature, scale and design of the specific proposal is appropriate to the site context. Paragraph 6.266 states that applications for tourism development will also be assessed in accordance with normal planning criteria such as access arrangements, design, environmental and amenity impacts so

as to ensure high quality, safe and otherwise satisfactory forms of development.

Impact on LLPA

8.6 The site falls within the Montalto LLPA (Designation BSL 01) from NAP 2016. Policy ENV 1 of NAP 2016 applies for LLPAs and development proposals must not adversely affect the environmental quality, integrity or character of a designated LLPA. Montalto LLPA features of importance include:

- This rising ground with its scarp slope defines the western edge of Bushmills.
- This area includes significant archaeology and natural habitats.

The open character of that part of the LLPA within the Causeway Coast AONB shall be fully retained.

8.7 All LLPAs have identified features quoted in their designation boxes and some have supporting text underneath. Within Montalto LLPA it states that proposals must not adversely impact upon key features of importance. The supporting text states “The open character of that part of the LLPA within the Causeway Coast AONB shall be fully retained”.

8.8 This proposal sites the caravans below the scarp slope which defines the western edge of Bushmills allowing its retention respecting this key feature of the LLPA. Although development is proposed within this LLPA within the Causeway Coast AONB, it is not considered to undermine the open character of this area. Development is low level as it consists of a reception building single storey in height and single storey caravans. This development is adjacent to Dunluce School and the playing pitches which are located within Bushmills settlement limit. The southern section of the site will be relatively screened by the built development to the north and east.

8.9 In relation to archaeology and natural features, the ecological and archaeological investigations have demonstrated there will be no adverse impacts. For full details of assessment see sub-headings “Archaeology” and “Natural Heritage”.

Tourism

- 8.10 Policy CTY 1 of PPS 21 Sustainable Development in the Countryside directs that planning permission will be granted for tourism development in accordance with the TOU policies of the Planning Strategy for Rural Northern Ireland. These TOU policies have been superseded by PPS 16 so this provides the main policy basis to assess the proposal.

Policy TSM 6 – New and Extended Holiday Parks in the Countryside

- 8.11 A new holiday park will be granted where it is demonstrated that the proposal is a high quality and sustainable form of tourism development. The location, siting, size, design, layout and landscaping of the holiday park must respect the surrounding landscape, rural character and site context.
- 8.12 The policy also requires that the following seven criteria is met; the site is located in an area that has the capacity to absorb the holiday park development, without adverse impact on visual amenity and rural character; effective integration into the landscape must be secured primarily through the utilisation of existing natural or built heritage; adequate provision is made for communal open space; the layout of caravan pitches/motor homes is informal and characterised by discrete groupings of units separated through appropriate soft landscaping; the design of the development, including the design and scale of ancillary buildings and the design of other elements including internal roads, paths, car parking areas, walls and fences, is appropriate for the site and the locality, respecting the best local traditions of form, materials and detailing; environmental assets are identified and, where appropriate, retained and integrated in a suitable manner; and mains water supply and sewerage services must be utilised where available and practicable.
- 8.13 The design of the holiday park is appropriate for the site and locality respecting the best local traditions of form, materials and detailing. The reception building includes administration, toilets/showers, laundry and a games room. This building is of traditional design with pitched roofs and projections and is single storey in height. Proposed materials/finishes include

blue/black roof tiles, smooth white render and stone finish for the walls and upvc rainwater goods & downpipes and upvc double glazed windows. The scale and massing of this building is acceptable in terms of location, design and materials/finishes.

- 8.14 Following amendments, the proposal has an informal layout as opposed to the more traditional 'regimented' rows of caravans associated with long standing caravan parks. Small informal clusters are proposed with open space and appropriate landscaping. There is a small section, south of the playing pitches, in which caravans are more linear but this is dictated by the restricted width of the site at this location. Long straight lines for roads and paths have been avoided.
- 8.15 Adequate amenity areas within holiday parks should be provided for communal open space. These should be approx. 15% of the site area which in this application is approx. 1.2 hectares given the overall size of the site at 8.3 hectares. Drawing No. 22A shows all amenity spaces connected with the holiday park with areas A, B & C totalling 25% of the site area. Area D includes the heavily landscaped scarp which measures approx. 1.6 hectares however this measurement is not included in calculations given it is not a useable area. There is sufficient space for amenity purposes within the proposed layout for this holiday park.
- 8.16 Site boundaries are to be formed by hedging some of which is being retained while the remainder is proposed. Drawing No. 26 shows the landscape plan relating to this development. Following amendments additional landscaping has been provided to assist with integration of this proposal. A landscape buffer, 5m in depth, is shown along the western boundary of the site which comprises proposed half standard trees. A similar landscape buffer is shown along the eastern boundary of the site adjacent to the access road and the playing pitches. Further trees are being planted along the northern section of the site adjacent to the playing pitches. Dense landscaping is also proposed along the northern section of the site south of the derelict stone buildings positioned along Dunluce Road.
- 8.17 Following assessment of potential views of this site in some instances they are limited by topography, enclosure (vegetation), interrupted by development or settlement and by

distance. There are no views of the site from the eastern edge of Bushmills on the rising land of Straid Road; from Craigaboney Road looking north; or from Priestland Road when entering Bushmills from Coleraine. More distant views include those from the higher land to the north and east along the Causeway Road and to the south and west on Round Hill along Ballyclough Road. Views of the site are possible when travelling both directions on the Dunluce Road and from Ballaghmore Road looking south. Critical views are deemed to be from Dunluce Road given the proximity to the site.

- 8.18 When travelling west along Dunluce Road from Bushmills, views of the majority of the site are restricted by the built form of Bushmills Primary School and Dunluce School. Critical views are looking over the playing pitches into the site. On the basis of this amended plans were received with additional landscaping along the site boundaries to assist with screening the proposed development. From this viewpoint, the caravans would integrate as the scarp feature forms a natural backdrop to the site.
- 8.19 When travelling east along the Dunluce Road from Portrush, views of the site are generally of the western section containing the reception building, recreational pitches, touring vans and caravans. Given critical views are sustained over a reasonable distance and due to limited roadside vegetation, amended plans were received showing a landscape buffer along the western site boundary. This should assist with protecting views once the vegetation is established and matured. From this viewpoint, the proposed development has the backdrop of built development given its location adjacent to the settlement limit of Bushmills as well as the scarp feature.
- 8.20 Site sections have been provided given the topography of the site. The caravans are concentrated on slacker gradients in the lower northern part of the site. The steep upper part of the site and the steeply sloping, rocky bluff – partially vegetated by gorse and scrub is being retained. Amendments show the caravans being set down as far as practically possible thereby limiting overall height. Alterations will occur to existing ground levels with excavation of approx. 1-2m at certain locations. Generally the site layout is respecting existing site levels where possible.

- 8.21 There will be a change in the landscape from rough pasture to built development. However, the addition of landscape buffers and new planting throughout as well as green open spaces will help to absorb this development into the site context. The additional landscaping along site boundaries will help soften the visual impact of the development and assist its integration with the surrounding area. The site is considered to be well contained in the wider landscape. The proposal is not considered to adversely harm visual amenity or rural character to such an extent to warrant refusal.
- 8.22 Archaeology, Built Heritage features and Natural Habitats within the site are not adversely impacted by this development. For full consideration see sub-headings “Archaeology”, “Listed Buildings” and “Natural Heritage”.
- 8.23 Mains water supply and sewerage services are to be utilised as identified on the P1 form.
- 8.24 The proposal conforms to the identified criteria (a-g) in Policy TSM 6 of PPS 16 as assessed above and meets the requirements of Appendix 4 – Landscape Design considerations for holiday parks.

Policy TSM 7 – Criteria for Tourism Development

- 8.25 All tourism developments must also comply with 6 design criteria and 9 general criteria set out in Policy TSM 7 of PPS 16. These criteria relate to design, layout, boundary treatment, drainage, crime, compatibility with surrounding land uses, landscape quality and character of the surrounding area, impact on neighbouring amenity, access arrangements, sewage disposal and impact on features of natural or built heritage.
- 8.26 The majority of criteria have already been explored and assessed under paragraphs 8.11 - 8.24 above and are acceptable.
- 8.27 Consideration of criteria (h) is required to ensure there is no harm to the amenities of nearby residents. The site is immediately adjacent to Dunluce School and playing pitches.

Residents closest to this development are Nos. 3 & 5 Craigaboney Road, Bushmills. North of the site adjacent to Dunluce Road are derelict stone buildings but planning permission is extant for 3 dwellings under C/2015/0130/F.

- 8.28 Nos. 3 & 5 Craigaboney Road should not be impacted negatively by this development given separation distances and their location higher than the application site. The scarp feature is being retained with the caravans being positioned on lower ground so there are no issues of overlooking or overshadowing. Noise should not be problematic given this relationship.
- 8.29 The extant permission for 3 dwellings must be considered north of the site in terms of protecting their residential amenity. There were initial concerns in terms of overlooking and noise due to the development comprising 6 recreational pitches and the reception building immediately south of the shared boundary. Amendments were received showing recreational pitches reduced to 3 with a greater separation distance from the shared boundary. The reception building was also positioned further away from the shared boundary. Site Section D-D shows a dense landscape buffer (vegetation on a mound) with a 20m separation from the pitches. These amendments to the site layout ensures protection of the residential amenity of prospective residents should these dwellings be constructed in the future.
- 8.30 A holiday park positioned beside Dunluce School is considered to be a compatible land use. There are no residential amenity concerns. Whilst objectors have highlighted safety concerns of school children from overlooking, the boundaries of the holiday park are to comprise hedging. If there are concerns with play equipment landing in either the grounds of the Holiday Park or school then this is a civil matter between land owners.
- 8.31 Consideration of criteria (j) is necessary as this relates to the proposal being capable of dealing satisfactorily with any emission or effluent. Surface water is to be disposed of via storm drains and foul sewage is to be disposed of via the mains. NI Water, DAERA: WMU and Environmental Health have no objections to this proposal.

Visual Impact and Rural Character

- 8.32 Permission will be granted where the proposal can be visually integrated into the surrounding landscape and it is of an appropriate design. Permission will be granted where the proposed building will not cause a detrimental change to, or further erode the rural character of an area.
- 8.33 Although the site is large at 8.3 hectares, the majority of the land is wrapped around the southern side of Dunluce School and to the rear of Bushmills Primary School and Bushmills Educational Centre. This assists in restricting views of the site from along the Priestland Road and part of the Dunluce Road. This section of the site is not regarded as prominent given its location and proposed caravans benefitting from the backdrop of the rising land along the southern site boundary.
- 8.34 The western section of the site is considered to be more prominent given its proximity to the roadside and the long range views available from Dunluce Road when travelling eastwards. In addition, it is this portion of land that contains the reception building, playing pitches as well as touring vans and caravans. The reception building is considered appropriate in design in terms of scale, massing and materials. This proposed building is located close to the stone outbuildings north of the site. If the 3 dwellings that have planning permission were to be constructed then this reception building would cluster which is more aesthetically pleasing than a building set out on its own. The dense landscape buffer positioned along the northern and western site boundaries will assist with integration of this proposal making sure there is adequate enclosure. The proposed holiday park with additional landscaping is considered to blend with the landform, slopes and other natural features which provide a backdrop.
- 8.35 Following landscape amendments, the proposal is considered to visually integrate into the surrounding area with buildings appropriately designed. Whilst a holiday park will occupy a site that was previously countryside, it does not erode the rural character of the area as this site is adjacent to the settlement limit of Bushmills. The proposal complies with Policies CTY 13 & 14 of PPS 21.

8.36 The application site is situated adjacent to the Bushmills Settlement Limit. Consideration of Policy CTY 15 of PPS 21 is relevant as this refers to the setting of settlements. The development is not considered to mar the distinction between a settlement and the surrounding countryside as there is no gap in-between. Built development in the form of derelict stone buildings is along the frontage of Dunluce Road. This area also has planning permission granted for 3 dwellings. The application site is positioned immediately behind these stone buildings. This results in no visual extension of development along the frontage of Dunluce Road. Although the remainder of the site will be developed as a holiday park, this is visually connected with the built development in the settlement of Bushmills. Landscapes around settlements have an important role to play and this will still be the case as west of the application site is countryside so this will still maintain the distinction between town and country. A rural setting to the built up area still remains.

Flooding

- 8.37 Consultation occurred with DFI Rivers who advised in review of The Strategic Flood Map (NI) that the development does not lie within the 1 in 100 year fluvial flood plain. An undesignated watercourse flows along the boundary between the proposed site and the school. A 5m maintenance strip is required unless the watercourse can be maintained from the opposite bank by agreement with the landowner. The site layout drawing shows space for maintenance and it should be protected from impediments. Clear access and egress should be provided at all times.
- 8.38 A Drainage Assessment (DA) was submitted with the application however it failed to meet the requirements of PPS 15. A watercourse at the south west corner of the site is being diverted outside its natural catchment. The DA fails to address flood risk elsewhere as a result of this. The DA fails to address the culverted watercourse that leaves the site and flows under the adjacent school tennis courts.
- 8.39 The proposal entails culverting open watercourses. The Agent claims the diversion is to achieve a quality layout and to facilitate access to the site. Policy FLD 4 of PPS 15 only permits artificial modification of a watercourse if it is necessary to provide access to

a development site or for engineering reasons. Following assessment of all proposed culverting within the site, it was deemed the proposal was contrary to this policy. Amendments were requested retaining watercourses where possible with culverting only proposed for access requirements.

8.40 An amended DA was submitted with amended plans. The amended proposal now retains un-designated watercourse No. 1 in its current position however, there will be a 10m long culvert to facilitate the creation of the new access road. Un-designated watercourse No. 2 will still be diverted however it is now proposed to retain watercourse No. 3 in its current position and the previously proposed 10m culvert will be repositioned to enable the construction of the site development road. Un-designated Watercourse No. 4 will be retained in its current position with the exception of the northern 30m which will be culverted to facilitate the construction of the new access road junction with the A2. Un-designated watercourse No. 5 remains unchanged.

8.41 DFI Rivers was consulted following receipt of the amended DA and plans and have no further objections to this proposal provided the drainage works in the DA document are implemented. The development should not increase the risk of flooding to the development or elsewhere. The proposal complies with Policies FLD 2, 3 & 4 of PPS 15.

Archaeology

8.42 There are a number of archaeological sites and monuments recorded within the site including a partially rock-cut souterrain which is of local importance. Consultation occurred with HED: Historic Monuments who requested an archaeological evaluation of the site. Following submission and review of this document, HED was content to proceed to archaeological licensing. Final consultation with HED advises the proposal satisfies Policy BH 2 of PPS 6, subject to conditions for the agreement and implementation of a developer-funded programme of archaeological works.

Listed Buildings

8.43 The proposal is in proximity of Dunluce Rectory, 15 Priestland Road; Old Grammer School; and 1-10 Klondyke Terrace which are

all listed buildings of special architectural and historic interest. Consultation occurred with HED: Historic Buildings who have no objections to this scheme subject to a condition. Native species trees and hedging shall be planted along the length of the eastern boundary of the site. There shall be maximum retention of hedgerow to all boundaries and minimal disruption to the existing landscape. The proposal therefore, satisfies paragraph 6.12 of the SPPS and Policy BH 11 of PPS 6.

Access and Parking

- 8.44 Planning permission will only be granted provided the proposal does not prejudice road safety or significantly inconvenience the flow of traffic. The proposed site access will be widened and there will be a dedicated right turn lane. This will ensure that traffic turning right into the development from Portrush will have a safe area in which to wait for a suitable gap without causing delay to other traffic. Parking requirements will be met through provision of spaces adjacent to the amenity building.
- 8.45 Objections have been raised in terms of volume of traffic generated by this development. Objections relating to road safety were forwarded to DFI Roads during assessment of this proposal. DFI Roads advise appropriate vehicle access standards are being applied to ensure a well-designed access for the safety and convenience of all road users.
- 8.46 Following the submission of several amended plans addressing previous issues identified by DFI Roads, the proposal is now satisfactory. DFI Roads have no further objections to this application subject to the final signing off of the PSD plans. The proposal is acceptable in terms of the proposed access and the car parking provision for this development. The proposal meets Policies AMP 1, 2 & 7 of PPS 3 and DCAN 15.

Natural Heritage

- 8.47 The proposal is hydrologically connected to Runkerry Area of Special Scientific Interest (ASSI) and Skerries and Causeway Special Area of Conservation (SAC). The application site contains trees, woodland, hedgerows, ponds and watercourses. Following consultation with DAERA: Natural Environment Division (NED), an

Ecological Impact Assessment is required to assess potential presence of protected and/or priority species and habitats.

- 8.48 A Preliminary Ecological Appraisal was received advising there was evidence of badgers and their places of refuge within the site. NED are content with this proposal given an adequate buffer to the badger setts have been provided. This 25m buffer must be retained and maintained between the badger sett entrances and all construction activity.
- 8.49 Consultation occurred with SES who has no objections to this proposal. Having considered the nature, scale, timing, duration and location of the project it is concluded that, provided mitigation is conditioned in any planning approval, the proposal will not have an adverse effect on site integrity of any European Site. Mitigation measures include a suitable buffer of at least 10m from all watercourses and storm drainage of the site must be designed to the principles of Sustainable Drainage Systems. This should help prevent polluting discharges entering the River Bush and impacting on the site integrity of Skerries and Causeway SAC.
- 8.50 Policy NH 6 of PPS 2 requires proposals within AONBs to be sensitive to the distinctive special character of the area and the quality of their landscape, heritage and wildlife. The proposal as considered in detail under sub-headings 'Tourism', and 'Visual Impact and Rural Character' above will not have a detrimental visual impact upon the existing Causeway Coast AONB.
- 8.51 The proposal fulfils the requirements of Policies NH 1, 2, 3, 5 & 6 of PPS 2.

Habitats Regulations Assessment

- 8.52 The potential impact of this proposal on Special Areas of Conservation, Special Protection Areas and Ramsar sites has been assessed in accordance with the requirements of Regulation 43 (1) of the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 (as amended). The proposal would not be likely to have a significant effect on the features, conservation objectives or status of any of these sites.

Other Matters

8.53 The impact on phone and TV signals in the area is not a planning related matter. There are no areas within the development that would encourage anti-social behaviour. The majority of communal open space areas are overlooked by caravans. The recreational pitches are close to the amenity building.

9 CONCLUSION

9.1 The proposed development is considered acceptable in this location having regard to the NAP 2016 and other material considerations, including the SPPS. The proposal has been considered against the policy tests set out for tourism development in the countryside. The proposal conforms to Policies TSM 6 & 7 of PPS 16 as the location, siting, size, design and layout of the holiday park is acceptable and does not adversely impact the surrounding landscape, rural character and site context. The holiday park does not adversely impact neighbouring residential amenity. Although development is proposed within the LLPA within the Causeway Coast AONB, it is not considered to undermine the open character of this area and development is not prohibited. Flooding and drainage have been considered with issues resolved in terms of limiting the amount of culverting. There are no adverse impacts upon archaeology, listed buildings and natural heritage. Access and parking arrangements are now acceptable. Approval is recommended.

10 CONDITIONS

1. As required by Section 61 the Planning Act (Northern Ireland) 2011 the development hereby permitted shall be begun before the expiration of 5 years from the date of this permission.

Reason: Time Limit.

2. The holiday park hereby permitted shall only be used for holiday accommodation and shall not be used for permanent residential accommodation.

Reason: The site is located within the countryside where development is restricted and this approval is granted solely at this location because of its holiday use/tourist purpose.

3. No site works of any nature or development shall take place until a programme of archaeological work has been implemented, in accordance with a written scheme and programme prepared by a qualified archaeologist, submitted by the applicant and approved by the Department. The programme should provide for the identification and evaluation of archaeological remains within the site, for mitigation of the impacts of development, through excavation recording or by preservation of remains, and for preparation of an archaeological report.

Reason: To ensure that archaeological remains within the application site are properly identified, and protected or appropriately recorded.

4. Access shall be afforded to the site at all reasonable times to any archaeologist nominated by the Department for Communities – Historic Environment Division to observe the operations and to monitor the implementation of archaeological requirements.

Reason: To monitor programmed works in order to ensure that identification, evaluation and appropriate recording of any archaeological remains, or any other specific work required by condition, or agreement is satisfactorily completed.

5. No development activity shall commence on site until a protection zone, clearly marked with posts joined with hazard warning tape, has been provided from each badger sett as shown on Drawing Number 11F (date stamped by the Planning Authority 13th August 2019) at a radius of 25 metres. No works, clearance, disturbance by machinery, dumping or storage of materials shall take place within that/those protection zone without the consent of the Department. The protection zone shall be retained and maintained until all construction activity has been completed on site.

Reason: To protect badgers and their setts.

6. A suitable buffer of at least 10 m must be maintained between the location of refuelling, storage of oil/fuels, concrete mixing and

washing areas, storage of machinery/materials/spoil etc. and all watercourses within or adjacent to the red line boundary.

Reason: To prevent polluting discharges entering the River Bush and impacting on the site integrity of Skerries and Causeway SAC.

7. Storm drainage of the site, during construction and operational phases, must be designed to the principles of Sustainable Drainage Systems (SuDS) in order to prevent the polluting effects of storm water on Skerries and Causeway SAC. Construction of SuDS should comply with the design and construction standards as set out in The SuDS Manual - Construction Industry Research and Information Association (CIRIA) Report C753.

Reason: To prevent polluting discharges entering and impacting on the site integrity of Skerries and Causeway SAC.

8. All hard and soft landscape works shall be carried out in accordance with the details shown on Drawing No. 11F date received 13th August 2019 and No. 26 received 10th June 2019 and the appropriate British Standard. The existing planting shall be permanently retained and the proposed planting (trees, grass areas, open space areas, hedgerows) shall be undertaken during the first available planting season following commencement of development.

Reason: To ensure the provision, establishment and maintenance of a high standard of landscape.

9. Should any retained or newly planted tree, shrub or hedge be removed, uprooted or destroyed or dies or becomes, in the opinion of the Planning Authority seriously damaged or defective within 5 years, another tree, shrub or hedge of the same species as the originally planted shall be planted at the same place, unless the Planning Authority gives its written consent to any variation.

Reason: To ensure the provision, establishment and maintenance of a high standard of landscape.

10. Native species trees and hedging shall be planted along the length of the eastern boundary prior to the occupation or operation of the proposed holiday park. There shall be maximum retention of hedgerow to all boundaries and minimal disruption to the existing landscape. New planting shall be carried out during the first planting

season of the development. Trees or shrubs dying, removed or becoming seriously damaged within five years of being planted shall be replaced in the next planting season with others of similar size and species unless the council gives written consent on any variation.

Reason: To protect the character of the setting of the listed buildings.

- 11 Half standard trees shall be planted along the eastern boundary of the site adjacent to the playing fields of Dunluce School and along the western boundary in accordance with Drawing No. 26 date received 10th June 2019. Half standard trees as well as the mounded screening as shown in Section A-A on Drawing No. 26 date received 10th June 2019 shall be planted along the northern site boundary behind the derelict buildings fronting onto Dunluce Road. These landscape buffers must be formed and planted prior to occupation of the development hereby approved.

Reason: In the interests of visual amenity.

- 12 A 5m maintenance strip shall be provided in accordance with Drawing No. 11F date stamped 13th August 2019 and should be protected from impediments (including tree planting, hedges, permanent fencing and sheds), land raising or future unapproved development.

Reason: To enable maintenance of the adjacent watercourse under Schedule 5 of the Drainage Order Northern Ireland 1973.

11 INFORMATIVES

1. This permission does not confer title. It is the responsibility of the developer to ensure that he controls all the lands necessary to carry out the proposed development.
2. This permission does not alter or extinguish or otherwise affect any existing or valid right of way crossing, impinging or otherwise pertaining to these lands.

3. This approval does not dispense with the necessity of obtaining the permission of the owners of adjacent dwellings for the removal of or building on the party wall or boundary whether or not defined.
4. This determination relates to planning control only and does not cover any consent or approval which may be necessary to authorise the development under other prevailing legislation as may be administered by the Council or other statutory authority.
5. You should refer to any other general advice and guidance provided by consultees in the process of this planning application by reviewing all responses on the Planning Portal at <http://epicpublic.planningni.gov.uk/publicaccess/>.
6. For guidance on the preparation of the Written Scheme and Programme of Archaeological Work, which should be submitted for approval at least 4 weeks before work is due to begin, contact:
Historic Environment Division – Historic Monuments
Causeway Exchange
1–7 Bedford Street
Belfast,
BT2 7EG
Tel: 02890 823100
Quote reference: SM11/1 ANT001:023 and LA01/2018/0040/F

Application for the excavation licence, required under the *Historic Monuments and Archaeological Objects (NI) Order 1995*, should be submitted at least 4 weeks before work is due to begin, by a qualified archaeologist responsible for the project, to:
Historic Environment Division – Historic Monuments Unit
Causeway Exchange
1–7 Bedford Street
Belfast,
BT2 7EG

7. The applicant's attention is drawn to Article 10 of the Wildlife (Northern Ireland) Order 1985 (as amended) under which it is an offence to intentionally or recklessly kill, injure or take any wild animal included in Schedule 5 of this Order, which includes the badger (*Melesmeles*). It is also an offence to intentionally or recklessly: damage or destroy, or obstruct access to, any structure or place which badgers use for shelter or protection; damage or destroy anything which conceals or protects any such structure;

disturb a badger while it is occupying a structure or place which it uses for shelter or protection.

Any person who knowingly causes or permits to be done an act which is made unlawful by any of these provisions shall also be guilty of an offence.

If there is evidence of badger on the site, all works must cease immediately and further advice sought from the Wildlife Team, Northern Ireland Environment Agency, Klondyke Building, Cromac Avenue, Gasworks Business Park, Belfast BT7 2JA. Tel. 028 905 69605

The applicant's attention is drawn to Article 4 of the Wildlife (Northern Ireland) Order 1985 (as amended) under which it is an offence to intentionally or recklessly:

- kill, injure or take any wild bird; or
- take, damage or destroy the nest of any wild bird while that nest is in use or being built; or
- at any other time take, damage or destroy the nest of any wild bird included in Schedule A1; or
- obstruct or prevent any wild bird from using its nest; or
- take or destroy an egg of any wild bird; or
- disturb any wild bird while it is building a nest or is in, on or near a nest containing eggs or young; or
- disturb dependent young of such a bird.

Any person who knowingly causes or permits to be done an act which is made unlawful by any of these provisions shall also be guilty of an offence.

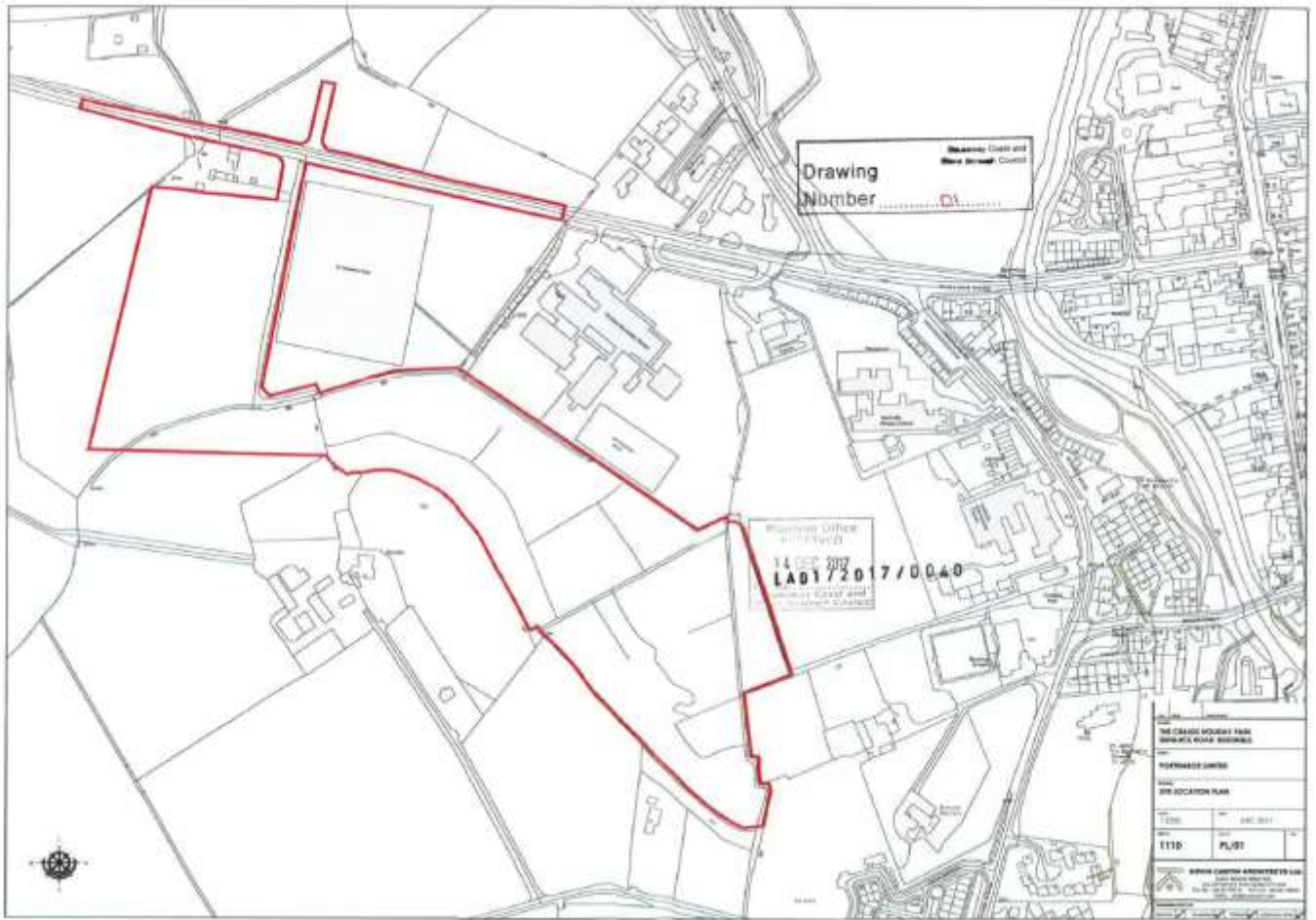
It is therefore advised that any tree, hedge loss or vegetation clearance should be kept to a minimum and removal should not be carried out during the bird breeding season between 1st March and 31st August.

The applicant's attention is drawn to Article 14 of the Wildlife (Northern Ireland) Order 1985 (as amended) which indicates that it is an offence to sell, offer or expose for sale, or have possession of or transport or cause to be transported for the purpose of sale at any premises, any live or dead wild plant, or any part of such a

plant, included in Part I or Part II of Schedule 8 of the Order, which includes the primrose (*Primula vulgaris*).

Any person who knowingly causes or permits to be done an act which is made unlawful by any of these provisions shall also be guilty of an offence.

Site Location



Site Layout

