

andrew@ccght.org

Date: 3rd September 2019

Tel: 028 7034 7244

Dear Andrew,

Re: Defence Heritage Conservation Management Plans.

Thank you for the opportunity to comment on the draft Conservation Management Plans (CMPs). The plans are very interesting and highlight the extensive array of defence heritage within the area. The work should help to realise the potential of what is currently an undervalued asset within the Borough.

In relation to the conservation policies outlined in the CMPs, it should be noted that, in planning terms, little weight could be attached to these as they do not form operational policies; and although some of the policies are worded as a formal policy, they mostly read as a series of aims and objectives. It may be beneficial to present these as Conservation Aims/Objectives or Guidance to avoid confusion with the relevant planning policies.

In addition, the supporting text to the conservation policies for the Heavy Anti-Aircraft Battery and the Limavady Trainer Dome makes reference to policy HE10 of PPS 5. This is an English policy document, therefore it is not operational policy in Northern Ireland.

In considering the need for planning permission, the construction of pathways, access gates and fencing along with the interpretation panels would constitute operational development and will likely require planning permission. Works to scheduled monuments are also likely to require separate consent for which an application should be submitted to the Department for Communities (DfC): Historic Environment Division (HED).

Any proposal coming forward for planning permission will be assessed under prevalent planning policy; currently the provisions of the Northern Area Plan (NAP) 2016, the Strategic Planning Policy Statement (SPPS) and the relevant Planning Policy Statement. Subject to the nature of the proposal these are likely to include:

- PPS 2: Natural Heritage
- PPS 3: Access, Movement and Parking
- PPS 4: Planning and Economic Development
- PPS 6: Planning, Archaeology and the Built Heritage
- PPS 8: Open Space, Sport and Outdoor Recreation
- PPS 11: Planning and Waste Management
- PPS 15 (Revised) Planning and Flood Risk
- PPS 16: Tourism
- PPS 17: Control of Outdoor Advertisements
- PPS 18: Renewable Energy
- PPS 21: Sustainable Development in the Countryside

WWII Trainer Dome, Aghanloo

The dome is identified as a Scheduled Monument on the NAP 2016 and is located within land zoned for economic development. Given the nature of the proposed works outlined in the CMP it is not perceived that the proposal would in any way prejudice the zoning.

Any proposal for works to the dome would be subject to consultation with DfC: HED, as would any application within the surrounding area which may impact on the scheduled monument and its setting.

Heavy Anti-Aircraft Battery, Magilligan; Lower Doaghs Pillbox, Magilligan; and Martello Tower, Magilligan

The cluster of sites in the Magilligan area are identified in NAP 2016 as State Care and Scheduled Monuments and fall within the AONB and other statutory designations. Given the environmentally sensitive nature of the site, NIEA, HED and Shared Environmental Service would be key consultees on any applications which come forward.

Works to the Martello Tower would also be the subject of an application for Listed Building Consent which should accompany an application for full planning permission. You may wish to discuss the proposals with HED prior to formalising plans as there may be some concern that the proposed car parking and toilets would detract from the overall appearance and setting of the Grade A listed tower.

Grangebeg Pillbox, Castlerock / Articlave

The Grangebeg pillbox is identified as a scheduled monument in the NAP2016 and falls within a Local Landscape Policy Area (LLPA). The site is also within the Binevenagh AONB and is within an environmentally sensitive location. The LLPA (PTL08) states that no development will be acceptable unless deemed essential in the overriding public interest. Based on the information provided the proposed works to the pillbox are limited to conservation and restoration within the footprint of the existing structure. As such this would not constitute operational development. The interpretation panel to be located on the Barmouth Road would require planning permission, however, this would fall outside of the LLPA.

Please do not hesitate to contact me should you wish to discuss further.

Yours faithfully,



Denise Dickson
Head of Planning