



**Causeway
Coast & Glens
Borough Council**

Planning Department
Cloonavin
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COLERAINE
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DfI Minister Mallon
Private.Office@infrastructure-ni.gov.uk

Date: 04 November 2021

Your Ref:

Our Ref: DfI PAN

(Please quote at all times)

Dear Minister Mallon

Subject: Publication of Implementation of Strategic Planning Policy on Development in the Countryside Planning Advice Note

I write on behalf of Causeway Coast and Glens Borough Council Planning Committee in relation to the above.

At its meeting held on 27 October 2021, the Planning Committee resolved that I should write on their behalf to express their extreme disappointment at the publication of the above Planning Advice Note (PAN) and to register Members support to the correspondence from UFU and Lisburn and Castlereagh Council.

Members acknowledge and welcome the withdrawal of the PAN on 15 October 2021 and note that you state that your Department "...will now take stock of the concerns raised and undertake further engagement and analysis on this important policy area, to include consideration of current and emerging issues..." Members welcome this further engagement and hope that it is considered and implemented having fully taken on board the input from all stakeholders.

As part of this further review, Members request that you take note of the following points in relation to this important policy area.

Members have considered the overall aim of the 'Call for Evidence' to provide an updated evidential context to inform the best strategic planning policy approach for development in the countryside. It is considered that this was not forthcoming through the publication of this PAN.

Members request that any review of strategic planning policy must reflect a two-tier planning system rather than imposing DfI interpretation of the correct policy for each Council area. Each area is different with different needs. The strategic policy within the SPPS restricts the ability of Councils to develop policies for their own Council area, based on their local knowledge of the needs of the rural communities, the main purpose of transferring plan-making powers to Council.

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Consideration must be taken, and policies amended, to reflect the new era in which we find ourselves. Working from home has become embedded in our lives and planning policy must reflect the needs of such. In addition, account must be taken of the changing farming practices and up-to-date needs of rural communities some 11 years after the publication of the PPS. For example, the Young Farmers Scheme to encourage the handover of farms to younger farmers who may not yet be able to demonstrate an active farm business for 6 years as they have been working within another farm business. The use of existing shared accesses is problematic in obtaining a mortgage for the development. Small farm business may not have multiple buildings on the farm and may rely on an existing domestic outbuilding for sheltering their small herd during lambing season; the sequential test of buildings, a building (including a domestic dwelling) or no building (in the situation of out-farms) has not been considered in this PAN.

Furthermore, in terms of 'Dwellings on a Farm' policy, Members note the following contradictions between the wording of Policy CTY10 of PPS21 and that contained within the PAN. The PAN at para.19 states that '...the Department considers that new dwellings on farms should be sited to visually link or cluster with an established group of buildings on the farm holding, which would not include a dwelling and domestic garage only.' However, Policy CTY 10 itself refers to the new dwelling as a building at criteria (c) which states "...the new building is visually linked or sited to cluster with an established group of buildings on the farm...". There is no further definition within the policy, nor indeed the justification and amplification to define a building on the farm. It is clear from the policy text that a dwelling is considered as a building. It is therefore unacceptable to attempt to exempt a dwelling and ancillary buildings from the definition of a building for the purposes of this policy.

I therefore urge you to review planning legislation and policy to assist Councils in fulfilling their roles in this two-tier planning system to deliver for the needs of this Borough as we move forward during this recovery stage of the current pandemic.

Yours sincerely



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