

# Addendum 3

## LA01/2017/0905/F

### 1.0 Update

- 1.1 Amended plans to include proposed site layout was submitted on 23<sup>rd</sup> September 2019. Please see below the revised site layout. The revised layout is assessed under Addendum to Planning Committee report.

### Amended Site Layout



1.2 On 17<sup>th</sup> August an email was received from the agent with 3 attachments. This included a letter which outlines several procedural issues and an initial rebuttal of the Planning Committee Report. The procedural and rebuttal issues raised include the following; anonymous

- The Planning Committee report dated August 2020 is a verbatim repeat of the September 2019 version even though this report was withdrawn from the schedule and is therefore obsolete.
- That while an Addendum has been added to consider the reduced scheme this could cause confusion if read in isolation.
- It is imperative to make clear to the Planning Committee during the Committee presentation the differences between the original and revised scheme and that the reduced scheme is now subject to a no objection from DFI Roads despite the stated PPS 3 AMP 2 refusal reason in the PCR.
- Important planning histories for a hotel/holiday cottages approval on the site was absent from the Planning Committee report. As a matter of law a lapsed planning permission can be a material consideration subject to weight.
- The Planning Committee report only referenced objections, not, the strong third party support (74 signatures) set out in the Pre Application Community Consultation Report which is unsatisfactory and must be addressed.
- The Planning Officer has failed to interpret policy correctly, specifically criterion (b) with reference to existing natural features. It is stated that these features relate to topography, not natural boundaries.
- It was stated that the policy is not prohibitive of proposed planting and in fact promotes planting where appropriate, planted areas or discrete groups of trees will be required along site boundaries to soften visual impact and assist with

integration. It was also stated that the planning officer fails to have regard for the permissive nature of planting in a proposal.

- Disagree with the Planning Officer that there is limited hedging and natural vegetation located along the boundaries of the site on Loguestown Road. It is stated that notably since the application submission the applicant has promoted its growth and augmented gaps.
- The Planning Committee report fails to mention the sites unique location parallel to the NW200 route along the boundary with Atlantic Road. The Planning Committee and Planning Committee Report can't point to a policy that prevents this being a material consideration.
- The retained openness along Atlantic Road has been welcomed by the NW200 organisers for both rider and spectator safety and is articulated in more detail in their letter of support.
- Stated that while a DFI Roads refusal reason remains the refusal reason will be addressed by way of final information submission relating to the footpath application LA01/2018/1473/F. It was stated that this final information submission could be conditioned in any case.
- The applicant's economists have identified that the benefit to the economy is £3.0 million GVA, £2.3 million and £0.8 million occurring during construction.
- At a local level the Council area will benefit from increased visitor expenditure, resulting in a local economic impact of £2.7 million GVA and 203 job-years over a period of 20 years.
- As a result of the Covid-19 outbreak research has identified that there will be an increase in domestic tourism and the staycation market due to restrictions on international flights, ongoing concerns of travellers and the risk of further

outbreaks. This information is sourced by a document produced by Tourism NI Consumer Statement Covid-19 dated 22<sup>nd</sup> July 2020.

- The RSM 2017 report assumed an average occupancy rate of 37% per month. In the current context this is likely to increase.
- The key matter is whether the perceived visual impact outweighs the significant economic benefits to merit refusal. This balancing act is framed against policy, planning history, local business support, an exceptional location along NW 200 route, opportunity to provide safe and secure spectator stand for NW 200, opportunity to provide a new pedestrian and cycle path along Atlantic Road, the proposed planting of 783 trees and the clear economic and tourism benefits.

- 1.3 A further document was received with 108 letters of support from local businesses surrounding the proposed development. Within these letters it was stated that the new pedestrian pathway associated with the application along Atlantic Road would clearly be a benefit. It was also stated that the location is adjacent to the NW 200 Road Route and that the proposed holiday park pays homage to this and is set back while still exploiting this unique location. Finally it was stated that the proposal will attract holiday makers which will have economic and social benefits for the town and wider Council area.
- 1.4 The final document is a letter of support from Coleraine and District Motor Club Ltd. Within this document it is stated that Atlantic Road forms an important part of the NW 200 circuit and at this particular location bikes will be travelling in excess of 100mph before slowing at the chicane. It is stated that safety for both our riders and spectators of the NW200 is of paramount importance. Coleraine & District Motor Club are pleased that the proposed landscaping is well considered and has been designed to take into account our specific safety comments.
- 1.5 The Motor Club also welcome the retained openness parallel to the circuit in the event that any rider collision or mechanical failure

occurs. It is noted that the proposed woodland planting within the site is set back a minimum of 10m from the circuit to avoid introducing physical hazards which would endanger rider safety.

- 1.6 Within this document Coleraine & District Motor Club state they are in advanced discussions with the applicant about providing a grand stand along Atlantic Road. This is welcomed as it will provide a designated and safe space for spectators along Atlantic Road.

### **Assessment**

- 1.7 The Planning Committee report of September 2019 was published on both the Planning Portal and the Causeway Coast and Glens Borough Council website when the final agenda for September's Planning Committee was published. It is the Council's protocol that these reports should not be altered and that if amended plans or additional information is submitted that these will be assessed using Addendums. The Addendum to the Planning Committee report provides an assessment of the amended plans submitted on 23<sup>rd</sup> September 2019. It also outlines the changes to the scheme and considers the DFI consultation response and also explains the rationale for retaining refusal reason 6 which relates to Policy AMP 2 of PPS 3. The outstanding information required to ensure the proposal complies cannot be conditioned as without it we cannot be sure that the principle of the foot/ cycle way is acceptable.
- 1.8 In regard to Planning Histories there was a previous application, reference C/1996/0484/O located to the North West of the current site submitted on 6<sup>th</sup> August 1996 for a Holiday Village incorporating lake and was withdrawn. A further application was submitted under C/1995/0433/O within the current site for a restaurant which was withdrawn. A further application was submitted within the site under C/1995/0432/F for the erection of a two storey building to provide travel accommodation with 41 bedrooms which was withdrawn. An outline application, reference C/1998/0569/O for a holiday home/ tourist accommodation on lands at 99 Atlantic Road was submitted on 20<sup>th</sup> August 1998 and was withdrawn. There was also an approval under application C/1990/0627/O and application C/1995/0593/O for a residential hotel and self-catering cottages located not within the site but to south of it and adjacent to 122 Atlantic Road. A reserved matters application was never submitted and therefore these permissions

have never been implemented on site and they would have been considered under different policies. They are also smaller sites and would have had a lesser visual impact than the proposed development under application LA01/2017/0905/F.

- 1.9 In regard to the letters of support provided within the Pre Application Community Consultation Report this related specifically to the Community Consultation Event and were never submitted as letters of support under this application. Within the main section of the Community Consultation report submitted with the application no mention was made of these signatures of support. These were included within an untitled Annex at the back of the report. These signatures of support are now acknowledged. However, it is still considered that the proposal is contrary to Planning Policy for the reasons set out in paragraphs 8.1 to 8.37 of the Planning Committee report.
- 1.10 In regard to the interpretation of criteria (b) of Policy TSM 6 it is stated within the policy that effective integration into the landscape must be secured primarily through the utilisation of existing natural or built features. It is considered that natural boundaries would fall within the definition of a natural feature. Concern was also raised in regard to the topography of the site which ensures the proposal does not have the capacity to absorb the proposed holiday park without having adverse impact on visual amenity and rural character.
- 1.11 It was also stated within the letter provided by the agent that the planning officer had failed to have regard to the permissive nature of planting under Policy TSM 6. In regard to this it is stated under criteria (b) of Policy TSM 6 that effective integration into the landscape must be secured primarily through the utilisation of existing natural or built features. In this case the site is quite open with post and wire fencing with small hedges located along the boundary onto Atlantic Road. There is limited vegetation located within the site and views are apparent from both Atlantic Road and Loguestown Road. In this case it is considered that proposal primarily relies on significant new planting to allow the development to be screened and not existing natural or built features. It is considered that the extent of the proposed planting would draw attention to the proposal rather than allowing it to integrate into the landscape. It will also significantly alter the rural

character of the lands in question as it will change the land from being open with limited planting on the boundaries to consisting of an area where there is a significant level of woodland planting.

- 1.12 Within the Planning Committee Report it is stated that there is limited hedging and natural vegetation located along the boundaries of the site on Loguestown Road. At the time of inspection the site had a very open aspect onto Loguestown Road with small hedges and post and wire fences. Loguestown Road is also located at a higher level to the site with lands falling gradually away toward Atlantic Road. This will emphasise the visual impact of the proposed development from Loguestown Road and also Roselick Road. Even if growth has been supported along this boundary and gaps augmented the views of the proposed holiday park will still be apparent given the topography of the site.
- 1.13 The site is located on the track of the NW 200 along Atlantic Road and it is accepted that this is unique to the site. Coleraine & District supports the scheme and is pleased with the proposed landscaping which considers the safety of riders and spectators. It is also stated that the potential for a grandstand would improve safety. However, the key consideration of this proposal is under Policy TSM 6 and it is considered that the proposed site does not have the capacity to absorb the proposed development and is unable to secure effective integration through the utilisation of existing natural or built features for reasons set out in paragraphs 1.7 and 1.8 of the Addendum to Planning Committee report.
- 1.14 A consideration of the overall economic benefit of the proposed development has been completed under paragraphs 8.43 to 8.46. It is accepted that there is likely to be an increase in the staycation market as a result of Covid-19 which may lead to an increase in the average monthly occupancy rate. However, it is considered that the overall detrimental impact of the proposal on rural character and its lack of visual integration outweighs the economic benefit of this proposal.
- 1.15 Within support letters from local businesses the provision of a new footpath along Atlantic Road has been welcomed. It must be noted that this new footpath is not proposed under this application but under Application reference LA01/2018/1473/F. This new footpath will link the proposed development to the existing footpath

on Atlantic Road. Additional information is required to consider the overall principle of this footpath. A consideration of the economic benefit and the sites location along the NW 200 track has been considered in paragraphs 1.13 and 1.14 of this Addendum.

## 2.0 **Recommendation**

- 2.1 That the Committee note the contents of this Addendum and agree with the recommendation to refuse, as set out in paragraph 9.1 of the Planning Committee Report