



Planning Committee Report LA01/2017/0905/F	25th March 2020
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>App No:</u>	LA01/2017/0905/F	<u>Ward:</u>	Dundooan
<u>App Type:</u>	Full		
<u>Address:</u>	Lands between 55 Loguestown Road and 122 Atlantic Road Portrush.		
<u>Proposal:</u>	Proposed holiday park comprising static caravans, touring caravan pitches, glamping pods, open space, children's play area, site office, welfare building, landscaping and access.		
<u>Con Area:</u>	N/A	<u>Valid Date:</u>	7 th July 2017
<u>Listed Building Grade:</u>	N/A	<u>Target Date:</u>	
Applicant:	Mr L Hanson		
Agent:	Clyde Shanks		
Objections:	41	Petitions of Objection:	0
Support:	0	Petitions of Support:	0

Executive Summary

- The proposed development is considered unacceptable in this location having regard to the NAP 2016 and other material considerations, including the SPPS.
- The site is located in the rural area as designated in the Northern Area Plan and is located in proximity to an Archaeological Site and Monument and the curtilage of a listed building.
- There has been 41 objections received on this application and DFI Roads has raised concern in regard to road safety.
- The location of the proposal is inappropriate in that the proposed development would have a detrimental impact on the character of the area as it fails to integrate into the surrounding landscape.
- The proposed development includes formalised and regimented rows of caravan and glamping pods which is contrary to policy. The proposal will have a detrimental impact on the landscape of the countryside which mars the distinction to the settlement of Portrush.
- It has also not been demonstrated that the development would not have a detrimental impact on road safety or significantly inconvenience the flow of traffic.
- The proposal fails to comply with relevant planning policies including the SPPS, PPS 21, PPS 16 and PPS 3.

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 **REFUSE** planning permission subject to the conditions set out in section 10.

2 SITE LOCATION & DESCRIPTION

- 2.1 The site is located approximately 1.4 miles from the town centre of Portrush and is located between Atlantic Road and Loguestown Road. A new vehicular access is proposed onto Loguestown Road. The site is located on approach and exit from Portrush from Atlantic Road and there are critical views from this road and Loguestown Road. The site is made up of agricultural lands and there is currently no development on the site with an exception of an area of hardstanding which included a former road which linked Atlantic Road and Loguestown Road. In terms of topography the site is quite flat and is set at a slightly lower level to Atlantic Road and the lands rise toward Loguestown Road. An existing watercourse also runs along the eastern and northern boundary of the site.
- 2.2 Lands surrounding the site are used predominantly for agricultural purposes. There are a number of dwellings in proximity to the site. Carnalridge Primary School and Ballywillan Presbyterian Church are also located close to the site. Hilltop Caravan Park is located to the north of the site opposite Loguestown Road.
- 2.3 The site is located in the rural area as designated in the Northern Area Plan.

3 RELEVANT HISTORY

LA01/2017/0033/PAN- Lands between 55 Loguestown Road and 122 Atlantic Road, Portrush. Proposed Holiday Park

comprising mobile caravans, site office, welfare building, landscaping and access.
PAN acceptable 14.02.2017.

LA01/2017/0300/PAD- Lands between No.55 Loguestown Road and No.122 Atlantic Road, Portrush BT56 8PD. Proposed Holiday Park comprising Mobile Caravans, Site Office, Welfare Building, Landscaping and Access.
PAD Concluded

LA01/2018/1473/F- Lands opposite Carnalridge Primary School connecting from existing bus stop to western side of Atlantic Road to existing footpath on eastern side of Atlantic Road at Magheraboy Brae. Proposed combined pedestrian and cycle path and crossing points.
Under Consideration

4 THE APPLICATION

- 4.1 The proposed development involves the development of a holiday park comprising static caravans, touring caravan pitches, glamping pods, open space, children's play area, site office, welfare building, landscaping and access.

Design & Access Statement

- 4.2 A Design & Access Statement is required under Article 6 of the Planning (General Development Procedure) Order (NI) 2015 as the application is considered to be a major application.
- 4.3 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.
- 4.4 The report date received on 18th July 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.

ENVIRONMENTAL IMPACT ASSESSMENT

- 4.5 This proposal was subject to an environmental impact assessment screening as highlighted by, The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.
- 4.6 The application was considered to fall within Schedule 2: Category 12(e) of the Regulations- Permanent camp sites and caravan sites which states that the threshold is when the area of the development exceeds 1 hectare. The site is 9.89 hectares.
- 4.7 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 an environmental statement.

5 PUBLICITY & CONSULTATIONS

External

- 5.1 **Neighbours:** 41 letters of objection were received in regard to this application. The key concerns raised include:

Roads Issues

- Road safety, concern regarding access and traffic impact
- Loguestown Road is very narrow and doesn't allow for two cars to pass
- Pedestrian access to Atlantic Road a death trap
- Development will create traffic bottlenecks as roads not designed to take additional traffic
- Traffic impact and under estimation of existing traffic
- Atlantic Road is a protected route and will ruin visual amenity
- Loguestown Road is very busy and this development would create an issue, accidents at this corner are an issue
- No footpath onto Atlantic Road
- No suitable footpath, impact of footpath link between Loguestown Road and Atlantic Road
- Traffic survey should be completed at the right time of the year
- No pedestrian walkway off the main entrance at Loguestown Road

- Junction of Glenmanus Road and Logestown Road very dangerous
- Allowance to cross Atlantic Road could lead to a fatality

Natural Heritage Impacts

- Impact on protected species, bats, badgers, kestrels, Turtle Doves, wagtails, hedgehogs, irish hares, common frogs, Irish Damsely and cowslips proposer report should be carried out 15th August 2017 G Huston
- Development will damage the nature conservation interest
- Impact of Japanese knotweed on the site, the site was levelled and redistributed across the site.
- Site is rich in flora and fauna and supports wildlife to include buzzards, herons and badgers.
- Impact on wildlife to include bats and badgers, impact on protected species cowslip and primroses and bluebells'

Visual Impact

- Visual impact as the town is already surrounded by caravan parks
- Impact on views and the countryside
- Detrimental visual impact and impact on AONB
- Development outside the urban footprint of Portrush this application like previous others should be refused
- Urban Sprawl and ribbon development and impact of amenity block
- This is the only road coming into Portrush that is not blighted with caravan parks, the development would be very obvious
- Site would be capable of housing a lot more plots than those proposed
- Area would lose natural beauty due to high levels of traffic
- Development overbearing and out of scale and character
- Urban sprawl, impact on character, land in a green belt
- Land unsuitable to absorb the holiday park element, impact on rural character
- Site is inappropriate for development of this nature, gateway to the causeway coast
- Dwelling would be surrounded by caravan park with already existing hilltop park

- Proposed conifers would be alien to the coastal zone and landscaping will only have leaves six months in the year
- Limited landscaping for integration purposes contrary to TSM 6
- Proposed planting would do little to soften the visual impact of the proposed development
- Proposed planting would draw attention to the site, due to topography, will landscaping conceal the effect of lighting
- Adverse impact on established character of a neighbourhood and impact on Landscape character
- Visual assessment in D&A Statement doesn't take into account topography of the site
- Irrational to create another caravan park
- Cumulative impact with Hilltop Caravan Park
- Site is located alongside the route of NW 200 will this improve the outlook

Noise and Amenity concerns

- Noise impacts as more people using the site
- Impact on sleep
- Safety and wellbeing of animals stored close to the proposed development
- Impact of litter and noise on receptors
- Noise and light disturbance
- Proposed footpath potential for anti-social behaviour
- No fire or risk assessment carried out

Economic consideration, need and impacts on tourism assets

- No development proposals in NAP for the proposed area
- For most of the year caravans and chalets are empty
- Not in keeping with the focus of the NAP to rebuild the town
- Destruction of Tourism assets and PPS 16 Policy Safeguarding Tourism Assets TSM 8
- Any employment opportunities would be seasonal and low paid
- larger scale caravans allow for permanent living, difficult to police the site
- No requirement for further developments of this nature
- Little economic advantage to the town

- No evidence of need as there already are a number of caravan parks
- Not the most appropriate new accommodation in Portrush
- Development will have an adverse impact on the tourism asset of Portrush

Neighbour Notification

- Concern that only 12 neighbour notifications were sent should be sent to a wider radius, period of two weeks to make representation unreasonable

Internal

5.2 **Historic Environment Division:** Has no objections.

NIEA: Has no objections.

DFI Roads: Has concerns with the proposed development.

NI Water – Has no objection

Environmental Health – Has no objections

DFI Rivers Agency- Has no objection.

Shared Environmental Services- Has no objection

Proposal of Application Notice

5.3 As this application is considered a major application 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 22nd December 2016 under LA01/2017/0033/PAN. The applicant advised that they intended to undertake the following forms of consultation:

- Press notice of the public event in a local paper and details of where additional information could be obtained.

- Letters sent to residents from 120 to 139 Atlantic Road and letters sent to residents at 43 to 54 Loguestown Road.
 - Notice served to Causeway Coast and Glens Borough Council Member Services.
- 5.5 It was stated that the public event would held on 6th February 2017 in Magheraboy House Hotel in Portrush.

Community Consultation Report

- 5.6 The community consultation report (CCR) was submitted as part of the planning application, received on 7th July 2017 which is more than 12 weeks after the Proposal of Application Notice was received, as required by the legislation.
- 5.7 It contains a copy of the methods of consultation carried out comments and feedback from the consultation exercise in the local context. The report demonstrates that consultation was implemented as agreed in the Proposal of Application Notice.
- 5.8 A total of 40 members of the public attended the event with only 16 of these completing the sign in sheet. It was also stated that of those who attended the event only 5 people provided feedback on the proposal. A further 12 people requested that the display board information be emailed to them for further consideration in which there was a number of follow up replies via email detailed in annex 8 of the report. The key issues raised relate to the scale of the development, traffic safety, visual impact, noise impacts and concerns relating to property values. These responses are set out in detail in the CCR.
- 5.9 The CCR demonstrates that adequate community consultation has taken place and the key issues of concern have been considered prior to the submission of the application.

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:

- Northern Area Plan 2016

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

Regional Development Strategy (RDS)

Northern Area Plan 2016

Strategic Planning Policy Statement (SPPS) 2015

Planning Policy Statement 2 (PPS2): Natural Heritage

Planning Policy Statement 3 (PPS3): Access Movement and Parking

Planning Policy Statement 6 (PPS 6): Planning Archaeology and the Built Heritage

Revised Planning Policy Statement 15 (PPS 15): Planning and Flood Risk

Planning Policy Statement 16 (PPS 16): Tourism

Planning Policy Statement 21 (PPS 21): Sustainable Development in the Countryside

8 CONSIDERATIONS & ASSESSMENT

- 8.1 The main considerations in the determination of this application relate to planning policy, principle of the development, impact on amenity and crime, traffic/road issues, flood risk and drainage, archaeology and built heritage, visual integration and rural character, the setting of settlements, natural heritage, Habitats Regulation Assessment, economic consideration and other matters.

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 (NAP), the SPPS, and relevant Planning Policy Statements specified above.
- 8.3 NAP 2016 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 of a high quality and sustainable form of tourism development. It continues under paragraph 6.265 that 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.

Principle of development

- 8.6 This proposal is for the development of a new holiday park and will include provisions for 115 static caravan pitches, 19 touring caravan pitches, 16 glamping pods, site office, amenity building, open space and children's play area, landscaping, public walkway and access onto Loguestown Road. A pedestrian access is also located onto Atlantic Road.
- 8.7 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. Therefore, PPS 16 provides the main policy basis to assess the proposal. The most relevant policy in PPS 16 is TSM 6 New and Extended Holiday Parks in the Countryside. Also relevant is TSM 7 Criteria for Tourism Development. TSM 6 recognises that holiday parks are important for the domestic tourism market in terms of the volume of rural tourism bed spaces they provide, and the economic benefits that flow from this scale of tourism activity.
- 8.8 Policy TSM 6 states that planning permission will be granted for a new holiday park or an extension to an existing facility where it is demonstrated that the proposal will create a high quality and sustainable form of tourism development. The location, siting, size, design, layout and landscaping of the holiday park proposal must be based on an overall design concept that respects the surrounding landscape, rural character and site context.
- 8.9 Proposals for holiday park development must be accompanied by a layout and landscaping plan, which has been provided in this instance. TSM 6 of PPS 16 requires that all proposals must meet a set list of criteria (a-g). Criterion (a) requires that 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. Criterion (b) requires effective integration into the landscape which must be secured primarily through the utilisation of existing natural or built features. Where appropriate, planted areas or discrete groups of trees will be required along site boundaries in order to soften the visual impact of the development and assist its integration with the surrounding area.

- 8.10 The proposed development will be located at a site between Loguestown Road and Atlantic Road. The boundaries of the site onto Atlantic Road are limited to post and wire fences with limited hedging. The site is quite open and flat and views of the site are apparent from Atlantic Road travelling North and South. The site rises to the northern boundary with Loguestown Road. Critical views are when travelling in and out of Portrush along Atlantic Road, from the Loguestown Road and from Roselick Road. The current nature of the site is of an open and rolling landscape with long range and short range views. Views of the site are open and the existing vegetation fails to screen the site. There is limited hedging and natural vegetation located along the boundaries of the site on Loguestown Road and again views are open and given the site falls away from Loguestown Road. It is considered that the scheme will have a detrimental impact on the immediate context of the area and its rural character. Due to the topography and open nature of the site, the proposal does not have the capacity to absorb the proposed holiday park without having adverse impact on visual amenity and rural character. This is not an appropriate site for such development.
- 8.11 Given the openness of the site, the limited natural boundaries and lack of built features the proposal fails to effectively integrate into the landscape. A landscaping plan has been submitted as part of the application which will provide planting of trees and hedges along the boundaries of the site in an attempt to screen the proposal from public view. It is considered that the extent of this landscaping in such an open and rising landscape would draw attention to the development rather than allowing it to blend into the surrounding countryside. The degree of planting proposed would in itself not be in keeping with the character of the area and the topography would prevent its enclosure. The proposal therefore fails to meet criteria (a) and (b) of this policy.

- 8.12 Criterion (c) of TSM 6 requires adequate provision (normally around 15% of the site area) is made for communal open space (including play and recreation areas and landscaped areas), as an integral part of the development. The larger areas of open space proposed as part of the scheme equate to approximately 1.37 hectares which is approximately 14% of the overall site which falls slightly below the 15% threshold. However there are smaller areas of open space and landscaped areas between each plot which would take it up to the 15% threshold. The proposed development is therefore considered acceptable having regard to this criteria.
- 8.13 Criteria (d) of TSM 6 states that the layout of caravan pitches/motor homes should be informal and characterised by discrete groupings or clusters of units separated through the use of appropriate soft landscaping. Criteria (e) states that 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.
- 8.14 The proposal has a formal layout and includes 'regimented' rows of caravans which will have a sea of caravan's effect. The site is located around three large clusters of open space. Given the scale of the proposed development there are many instances of linear rows of caravans. There are also regimented rows of glamping pods proposed as part of the application. Within appendix 4 of PPS 16 it is stated that small informal clusters separated by appropriate landscaping should be used but this has not been provided as part of this application. The proposal also includes long straight lines of internal roads throughout the site which again is formal in nature. The proposed ancillary buildings are one storey and would not have a detrimental impact on the landscape. The proposed walls and fencing located along the boundaries of the site are considered acceptable. Taking into consideration the layout the proposed development is contrary to criteria (d) and (e) of this policy.
- 8.15 Mains water and mains sewerage is available to facilitate the site and there is available capacity in the waste water treatment

works to facilitate the proposed development. The proposal is also capable of dealing with any emission or effluent in accordance with legislative requirements. NI Water and DAERA Water Management Unit was consulted in regard to this and raised no concern. The proposal is therefore compliant with criterion (g) of TSM 6 and criterion (j) of TSM 7 of PPS 16.

- 8.16 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, impact on character and neighbouring residents, access arrangements, sewage disposal and impacts on features of natural or built heritage. Criteria relating to design, layout, boundary treatment and sewage disposal has been considered under paragraphs 8.6 to 8.14 of this report. The other criteria will be considered in detail in the remainder of this report.

Impact on Amenity and Crime

- 8.17 The proposed development is located in proximity to a number of residential premises located along Atlantic Road and Loguestown Road. These residential premises include the dwellings at 120 to 143 Atlantic Road and 52 to 67 Loguestown Road. A consideration must also be had in regard to Carnalridge Primary School which is located directly opposite the site. The dwellings at 120 and 122 Atlantic Road are located 40 and 60 metres from the site. There is also a 14 metre landscape buffer between the dwellings and the proposed site which is made up of trees and hedging. It is considered therefore that the proposed development would not have a detrimental impact on the amenity of these dwellings by way of overlooking or overshadowing. The dwellings located at 123, 125, 127, 141 and 143 Atlantic Road do not directly abut the site and are located on the opposite side of the road to the development. There is a separation distance of between 40 to 80 metres to the site. Given this and the proposed landscaping it is considered that the proposal will not have a detrimental impact on the amenity of these residents.

- 8.18 A holiday park located directly opposite Carnalridge Primary School is considered to be a compatible land use. There are no

residential amenity concerns. The nearest caravan plot of glamping pod is located approximately 60 metres from the site. A large area of open space associated with the proposed development and landscaping is located between the two sites. There is also a gated pedestrian access onto Atlantic Road which is opposite the school grounds. The site will also be secured with 1.8 metre high mesh fencing and hedging.

- 8.19 The residential dwellings located at 53 and 55 Loguestown Road are located closest to the site and share a boundary with the proposed development. A landscape buffer of between 14 and 18 metres is proposed between the site and the existing dwellings. The closest caravan pitch is located approximately 31 metres from the dwelling at 53 Loguestown Road and 53 metres from the dwelling at 55 Loguestown Road. Given this separation distance and the proposed landscaping the proposed development will not have a detrimental impact on the amenity of these residents.
- 8.20 The dwellings at 52, 54, 57, 59, 61, 63, 65 and 67 Loguestown Road do not share a common boundary with the proposed development and sit at a lower level to the proposed holiday park. The dwelling at 52 Loguestown Road is located approximately 25 metres from the proposed development but this is located on the opposite side of the road and there is landscaping between it and the proposed holiday park. It is considered that the proposed development would not have a detrimental impact on this dwelling. The remaining dwellings are located between 50 and 150 metres from the proposed development, are located at a lower level and with the proposed landscaping it is considered that the proposal would not have a detrimental impact on the amenity of these receptors.
- 8.21 Environmental Health was consulted in regard to the proposed development to further consider the potential impacts of the proposed development on the amenity of neighbouring residents. Environmental Health raised no concern subject to conditions and informatives relating to noise, contamination, LPG and The Caravans Act.
- 8.22 A number of objections has been received in regard to the proposed development which raises concern in regard to noise impacts, light disturbance, anti-social behaviour, impact of litter,

impact on sleep, safety of animals and concern that no fire risk has been provided. Environmental Health was consulted in regard to these representations. Environmental Health stated that they had suggested informatives in relation to control of noise from construction operations. It was also stated that the applicant shall ensure that all plant and equipment used in connection with the proposal are so situated, operated and maintained as to prevent the transmission of noise and odour to surrounding sensitive receptors. EHO stated that, where artificial lighting is proposed the applicant is advised to ensure that the lighting is designed to obviate any adverse impacts arising from light spill and glare encroaching onto light sensitive properties. It was also stated that any concerns in relation to noise and litter arising from the occupants of the caravan park would be issues dealt with by effective site management.

- 8.23 Concern regarding the lack of fire risk assessment is not a material planning consideration. In regard to impact on sleep and safety of animals the nearest receptors are located at 53 and 55 Loguestown Road which shares a common boundary with the proposal. There is a landscape buffer of approximately 14 to 18 metres between these dwellings and the proposed development which will reduce the noise impact. The other dwellings in proximity to the site have larger separation distances and the landscape buffer will reduce noise impacts.

Traffic/road issues

- 8.24 The proposed development will be accessed via Loguestown Road and there will be a pedestrian access onto Atlantic Road. A Transport Assessment form was provided to assess the impacts of the proposal on traffic flow and parking. DFI Roads was consulted in regard to this proposal and did raise a number of concerns with the proposed development. Through amended plans some of these issues have been resolved but outstanding information still remains.
- 8.25 In the most recent consultation response DFI Roads stated that the proposed passing bays and the cross sections for the road widening along Loguestown Road are now acceptable. Additional information to include a typical cross section taken through the road widening onto Loguestown Road and

information relating a staggered barrier at the pedestrian access on to Atlantic Road was requested. It was also stated that the principle of the proposed footpath /cycle path on Atlantic Road under application reference LA01/2018/1473/F has yet to be established to provide the required pedestrian link to Portrush. DFI Roads stated that they would not be in a position to recommend approval of this application until we have recommended approval for the proposed footpath/cycle path. Amended plans have since been provided for both applications and there are outstanding consultation responses from DFI Roads. As the principle is not acceptable at this location therefore the proposal can be taken forward to the Planning Committee. Due to outstanding information the proposed development has not been able to demonstrate that the proposal will not have a detrimental impact on road safety or significantly inconvenience the flow of traffic. The proposal is therefore fails to comply with Policy AMP 2 of PPS 3.

- 8.26 A number of objections have been raised in regard to the proposed development which includes concern relating to road safety, increased traffic, the potential for accidents, concern regarding a pedestrian entrance onto Atlantic Road and concerns in regard to the narrowness of Loguestown Road. In regard to these concerns DFI Roads was consulted but raised no specific concerns in regard to the objections. However, requests for a number of passing bays along Loguestown Road have been made and are to be provided as part of the application. These are located within blue lands under the control of the applicant and can be conditioned as part of any approval. DFI Roads are content with the provision of these. Further to this a planning application reference LA01/2018/1473/F has been submitted which proposed a footpath/cycle path from the pedestrian access of the holiday park toward Portrush. There is outstanding roads concerns regarding this application and LA01/2018/1473/F. It has not been demonstrated that the proposal will not have a detrimental impact on road safety or significantly inconvenience the flow of traffic.

Flood Risk and Drainage

- 8.27 The Strategic Flood Map (NI) indicates that the site lies partially within the 1 in 100 year fluvial flood plain. This includes a small

area along the northern and eastern boundaries of the site. Under Policy FLD 1 of PPS 15 Development will not be permitted within the 1 in 100 year fluvial flood plain (AEP7 of 1%) unless the applicant can demonstrate that the proposal constitutes an exception to the policy. A 1.8 metre high mesh fence and hedging is located between the development associated with the proposal and this flood plain. The lands associated with the flood plain will remain as open space and therefore is considered an exception. A flood risk assessment was provided to assess flood risk further. DFI Rivers stated that while not being responsible for the preparation of the Flood Risk assessment accepts its logic and has no reason to disagree with its conclusions. DFI Rivers therefore cannot sustain a reason to object to the proposed development from a flood risk perspective.

- 8.28 As an undesignated water course flows along the northern and eastern boundaries of the site Policy FLD 2 of PPS 15 applies. Under this policy a 5 metre maintenance strip is required unless the watercourse can be maintained from the opposite bank by agreement with the landowner. It was also stated that there is space for this strip and it should be protected from impediment. This could be conditioned under any approval.
- 8.29 Under Policy FLD 3 of Planning Policy Statement 15 a Drainage Assessment will be required for a development site in excess of 1 hectare. The proposed development exceeds this threshold. A drainage assessment was provided as part of the application and a consultation was sent to DFI Rivers for consideration. It was stated that the drainage assessment only lacks a letter from Northern Ireland Water for consent to discharge storm water which policy stipulates in D18 bullet point 2. DFI Rivers considered that while not being responsible for the preparation of the report accepts its logic and has no reason to disagree with its conclusions. Consequently, DFI Rivers cannot sustain a reason to object to the proposed development from a drainage perspective.

Archaeology and Built Heritage

- 8.30 The application site is in proximity to an archeological site and monument in the form of a Cairn (LDY003:073) which is a

monument of local importance. Policy BH2 of PPS 6 which relates to the Protection of Archaeological Remains of Local Importance and their Settings applies.

- 8.31 An Archaeological Impact Assessment was submitted as part of the application. Historic Environment Division was consulted to consider this report and are content that the proposal satisfies PPS 6 policy requirements, subject to conditions for the agreement and implementation of a developer-funded programme of archaeological works. This is to identify and record any archaeological remains in advance of new construction, or to provide for their preservation in situ, as per Policy BH 4 of PPS.
- 8.32 The proposed development is located in proximity 3 Grade B1 listed buildings at 44 Magheraboy Road, 41 Magheraboy Road and Ballywillan Presbyterian Church on Atlantic Road. The site is also located in proximity to a grade B2 listed building at 52 Loguestown Road. HED Historic Buildings consider that since the Listed Buildings are all separated from the site by main roads they are sufficiently removed provided appropriate screening is planted. The proposal therefore will not have a detrimental impact on the setting of any listed building and is compliant with Policy BH 11 of PPS 6.

Visual Integration and Rural Character

- 8.33 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. Within paragraph 6.70 of the SPPS it is stated that all development in the countryside must integrate into its setting, respect rural character, and be appropriately designed.
- 8.34 The development site is open and there is limited existing natural boundaries located around the site to screen the proposal from public view. Views of the site are apparent from Atlantic Road, Loguestown Road Roselick Road and Magheraboy Road. Landscaping is proposed as part of the scheme, given the elevated nature of the site with topography rising toward Loguestown Road this screening would not be

sufficient to reduce the adverse impact on rural character. The proposed landscaping would draw attention to the proposed development. Given the openness of the site it is also considered that this planting in itself would have a detrimental impact on rural character. It is considered that the proposed development will not visually integrate into the landscape. The proposal therefore fails to comply with Policies CTY 13 & 14 of PPS 21.

- 8.35 A number of objections have been raised in regard to the proposed developments visual impact on the countryside, impact on rural character, potential for urban sprawl, impact of caravans on the site, impact of proposed landscaping, no consideration of topography and cumulative impact with an existing caravan park. The majority of these criteria have already been explored and assessed under paragraphs 8.6 - 8.15 and 8.31, 8.32, 8.34 and 8.35. In regard to cumulative impact with the Hilltop caravan park there is a difference in levels between the two developments which would make them distinct from each other.

The Setting of Settlements

- 8.36 Having regard to Policy CTY 15 of PPS 21 planning permission will be refused for development that mars the distinction between a settlement and the surrounding countryside or that otherwise results in urban sprawl. Landscapes around settlements have a special role to play in maintaining the distinction between town and country, in preventing coalescence between adjacent built-up areas and in providing a rural setting to the built up area.
- 8.37 It is considered that the proposed development would have a detrimental impact on the current landscape surrounding Portrush which is important in maintaining the distinction between the town and country. The current open landscape with limited hedged boundaries will be replaced with a holiday park with large trees which is not consistent with the character of the area. The proposal therefore fails to meet with Policy CTY 15 of PPS 21.

Natural Heritage

- 8.38 Planning permission will only be granted for a development proposal that is not likely to harm a European protected species. Planning permission will only be granted for a development proposal that is not likely to harm any other statutorily protected species and which can be adequately mitigated or compensated against. DAERA Natural Environment Division was consulted in regard to this application and had raised concern in regard to the impact of the proposal on the natural environment. A biodiversity checklist and clarification on the surveys completed was submitted as part of the application. DAERA Natural Environment Division are now content with the proposal subject to conditions relating to construction works, surface run off and planting. The proposal therefore complies with Policy NH 1 and NH 2 of PPS 2.
- 8.39 A number of concerns have been raised in regard to impacts on protected species and other wildlife and the impact of Japanese knotweed on the site. DAERA Natural Environment Division was made aware of these comments but are content with proposal after a biodiversity checklist and additional information relating to surveys was provided.

HABITAT REGULATIONS ASSESSMENT

- 8.40 The application was considered in light of the assessment requirements of Regulation 43 (1) of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) by Shared Environmental Service on behalf of Causeway Coast and Glens Borough Planning Authority.
- 8.41 The site is hydrologically linked to the Skerries and Causeway SAC which is a European protected site. A formal consultation was sent to Shared Environmental Services to consider the proposed development. SES did request additional information and a biodiversity checklist and additional information was provided. SES stated that having considered the nature, scale, timing, duration and location of the project it is concluded that further assessment is not required because it would not have a likely significant effect on the selection features, conservation objectives or status of any European site.

8.42 The potential impact of this proposal on Special Protection Areas, Special Areas of Conservation 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 of any European site.

Economic Consideration

8.43 In line with paragraph 3.3 of the SPPS we must ensure economic considerations are accorded appropriate weight in the taking of planning decisions. The SPPS goes on to state that a modern, efficient and effective planning system is essential to supporting the Executive, and wider government policy, in its efforts to promote long term economic growth in the interests of all the people in this region and therefore Planning authorities should take a positive approach to appropriate economic development proposals, and proactively support and enable growth generating activities. When assessing the positive and negative economic implications of planning applications there is a need to ensure the approach followed is proportionate to the scale, complexity and impact of the proposed development.

8.44 An economic benefits assessment was provided in support of the application. It was stated that the proposed development will have the following benefits.

Construction

- Estimated turnover £850,000 with 0.8 million Gross Value added.
- Provide 14 construction jobs with a £0.4 million wage boost.

Operation

- £2.3 million Gross Value added.
- Provision of 129 job-years with a £1.8 million wage benefit.

Visitor Expenditure

- £2.7 million Gross Value added

- Provision of 203 job-years
- £2.5 million wage boost

Other benefits

- Increased property rates revenue
- Higher visitor footfall in the area
- Increased sales of caravans.
- Improved tourism offering and increased accommodation stock.

8.45 Although it is accepted that the proposed development would have an economic benefit, it is considered that the overall detrimental impact of the proposal on rural character and its lack of visual integration outweighs this benefit. Therefore the proposed development will be recommended for refusal.

8.46 Within the objection letters received there was a number of concerns raised to include the destruction of tourism assets, type of employment opportunities, limited economic benefit, larger caravans would allow for permanent living, no evidence of need, appropriateness of the type of accommodation, site not zoned for development of this nature in Northern Area Plan. The overall economic benefit has been considered under paragraphs 8.42 to 8.44 of this report. In regard to impacts of existing tourism assets TSM 8 of PPS 16 would be the relevant policy. However, the area in which development is proposed is not considered a tourism asset which is defined as any future associated with the built or natural environment which is of intrinsic interest of tourists. In regard to permanent living at the holiday park a condition would be placed on any approval if deemed acceptable for an application of this nature to prevent this from happening. Although the site is not zoned for development within the Northern Area Plan it is not to say development cannot take place at this site. If development is considered compliant with a particular planning policy it may be acceptable on white lands.

Other Matters

- 8.47 An objector raised concern that the neighbour notification was only sent to 12 properties. In line with The Planning General Development Procedure Order 2015 there is a requirement to serve notice to any identified occupier on neighbouring land. All relevant neighbours have been notified as part of the application.
- 8.48 Another objector raised concern in regard to their loss of view. However, within the SPPS it is stated that the basic question is not whether owners and occupiers of neighbouring properties would experience financial or other loss from a particular development, but whether the proposal would unacceptably affect amenities and the existing use of land and buildings that ought to be protected in the public interest. It is not considered that the loss of this view would unacceptably affect the amenities of the existing dwellings

9 CONCLUSION

- 9.1 The proposed development is considered unacceptable 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 location of the proposal is inappropriate in that the proposed development would have a detrimental impact on the character of the area as it fails to integrate into the surrounding landscape. The proposed development includes formalised and regimented rows of caravan and glamping pods which is contrary to policy. The proposal will have a detrimental impact on the landscape of the countryside which mars the distinction to the settlement of Portrush. It has also not been demonstrated that the development would not have a detrimental impact on road safety or significantly inconvenience the flow of traffic. Refusal is recommended.

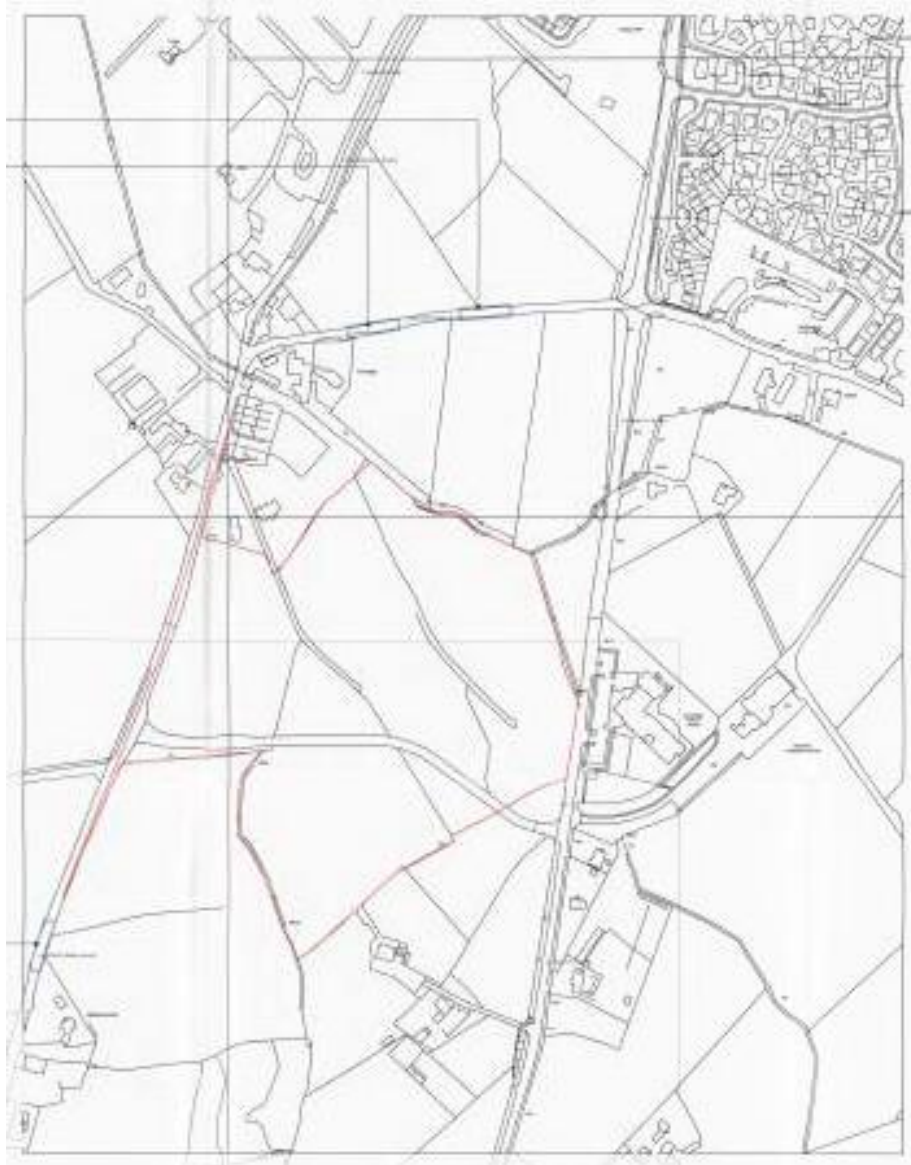
Refusal Reasons

10.1 Reasons:

1. The proposal is contrary to paragraph 6.266 of the Strategic Planning Policy Statement and Policy TSM 06 of Planning Policy Statement 16 in that the site selected: does not have the capacity to absorb the holiday park development and would if approved have an adverse impact on visual amenity and rural character and; the proposal is unable to secure effective integration through the utilisation of existing natural or built features.
2. The proposal is contrary to paragraph 6.266 of the Strategic Planning Policy Statement and Policy TSM 6 of Planning Policy Statement 16 in that the design and layout of the holiday park is formal and would have a detrimental visual impact.
3. The proposal is contrary to paragraph 6.77 of the Strategic Planning Policy Statement and Policy CTY13 of Planning Policy Statement 21: Sustainable Development in the Countryside, in the proposal is a prominent feature on the landscape; is unable to provide a suitable degree of enclosure for the proposal to integrate into the landscape; and therefore would not visually integrate into the surrounding landscapes.
4. The proposal is contrary to paragraph 6.77 of the Strategic Planning Policy Statement and Policy CTY 14 of Planning Policy Statement 21: Sustainable Development in the Countryside, in that the proposal would, if permitted, be unduly prominent in the landscape; would result in a suburban style build-up of development when viewed with existing and approved buildings; and would therefore result in a detrimental change to the rural character of the countryside.
5. The proposal is contrary to paragraph 6.77 of the Strategic Planning Policy Statement and Policy CTY 15 of Planning Policy Statement 21: Sustainable Development in the Countryside, in that the proposal would, if permitted, mar the distinction between the settlement and the surrounding countryside and would lead to urban sprawl.

6. The proposal is contrary to paragraph 6.303 of the SPPS and Planning Policy Statement 3, Access, Movement and Parking, Policy AMP 2, in that it has not been demonstrated that the proposal would not prejudice road safety or significantly inconvenience the flow of traffic.

Site Location



Addendum

LA01/2017/0905/F

1.0 Update

- 1.1 Amended plans to include proposed site layout, proposed site access detail and visibility splay plan, proposed landscaping plan and proposed site sections plan was submitted on 23rd September 2019. An amended P1 form was also submitted on this date which altered the proposal description to

‘Proposed Holiday Park (amended and reduced scheme) comprising 71 static caravans, 12 touring caravan pitches, 13 glamping pods, open space, childrens play area, site office, welfare building, landscaping to include additional buffer planting and access.’

- 1.2 A further neighbour notification advising that amended plans and an amended description had been received was sent out on 11th October 2019 and expired on 25th October 2019. DFI Roads was also consulted in regard to the amended drawings. DFI Roads did take note of the reduced scheme and did state that the passing bays on Loguestown Road previously agreed are still required. It was also stated that DFI Roads are still not in a position to recommend approval of this application as the planning application for the proposed cycle/footpath planning application Ref. LA01/2018/1473/F has not been agreed in principle. Environmental Health was consulted in regard to the amended scheme and raised no concerns.

- 1.3 Since the previous Planning Committee report was submitted 4 additional representation letters were received. This takes the total number of representations to 45 in which 24 are from separate addresses. The representations received are from those who had already objected to the initial proposal and the issues raised are similar. The issues raised to include visual impact, traffic impact and nature and conservation impacts have been addressed in paragraphs 8.6 to 8.39 of the Planning Committee report.

1.3 An office meeting took place on 11th October to discuss the concerns raised by DFI Roads. It was advised at this meeting that the amended plans had not yet been fully assessed. The key discussion of this meeting revolved round the DFI Roads concerns. The agent raised concern regarding the level of detail required and raised the example of a footpath on the opposite side of Atlantic Road which was constructed with a splay of 2.5 x 11 metres. The agent stated they would prepare a submission. It was agreed that DFI Roads would be consulted in regard to this. Following this meeting a further supporting document 'Footway Fundamentals' was submitted on 11th October 2019 relating to previous planning histories and the need for a footway link. DFI Roads was consulted in regard to this document and it was stated that DFI Roads are now in a position to recommend approval subject to conditions.

1.4 Condition 3 of the consultation response stated,

'The development hereby approved shall not become operational until the proposed footpath/cycle path on Atlantic Road which is subject to Planning Application Ref. LA01/2018/1473/F has been approved and constructed.'

Reason: In the interest of road and pedestrian safety

1.5 Application reference LA01/2018/1473/F is still under consideration. In regard to this application DFI Roads in their most recent response dated 17th January 2020 stated they will accept the principle of the construction of the proposed footpath/cycle path subject to additional details being provided. These details include PSD drawings, detailed cross sections, provision of a boundary fence, a typical cross section through the proposed footway/cycle path and provision of notes to include details of a culvert extension and any open drains. This information has not been provided but the remaining issues can be resolved with the submission of the additional information as requested by DFI Roads. The information requested includes operational development that would require planning permission in its own right. This information will have an impact on whether the principle of the development is acceptable. Without this information we can't be sure that the principle of this foot/cycle path is acceptable. Therefore refusal reason 6 of the Planning Committee report still applies.

Assessment

- 1.5 As part of the initial assessment, concern was raised in regard to the formal layout of the proposed caravan park which included regimented rows of caravans which would have a sea of caravan's effect. In terms of the amended layout there has been a reduction in the number of units proposed from 115 static caravan pitches, 19 touring caravan pitches and 16 glamping pods to 71 static caravan pitches, 12 touring caravan pitches and 13 glamping pods. The revised layout is considered informal and is characterised by 13 more discrete clusters of static caravans, touring caravan and glamping pods. These clusters are separated through the use of appropriate soft landscaping. The internal roads and pathways are now more informal and follow the pattern of the caravan clusters. The proposed ancillary building remain 1 storey and will not have a detrimental impact on the landscape. The other ancillary works to include proposed walls and fencing along the boundaries of the site are acceptable. The proposal is now considered compliant with criteria (d) and (e) of Policy TSM 6 of PPS 16. Therefore refusal reason 2 of the Planning Committee report can be removed.
- 1.6 Although the overall scheme has been reduced in scale the proposal still does not have the capacity to be absorbed into the landscape without having an adverse impact on visual amenity and rural character given the topography of the site, the open nature of the site and the limited natural boundaries. It is also considered that the extent of this landscaping used to screen the proposal in such an open and rising landscape would draw attention to the development rather than allowing it to blend into the surrounding countryside. The degree of planting proposed would in itself not be in keeping with the character of the area and the topography would prevent its enclosure. Therefore refusal reasons 1, 3, 4 and 5 of the Planning Committee report still applies.

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.

3.0 Refusal Reasons

1. The proposal is contrary to paragraph 6.70 and 6.266 of the Strategic Planning Policy Statement and Policy TSM 06 of Planning Policy Statement 16 in that the site selected: does not have the capacity to absorb the holiday park development and would if approved have an adverse impact on visual amenity and rural character and; the proposal is unable to secure effective integration through the utilisation of existing natural or built features.
2. The proposal is contrary to paragraph 6.70 and 6.77 of the Strategic Planning Policy Statement in that the proposal is a prominent feature on the landscape; is unable to provide a suitable degree of enclosure for the proposal to integrate into the landscape; and therefore would not visually integrate into the surrounding landscapes.
3. The proposal is contrary to paragraph 6.70 and 6.77 of the Strategic Planning Policy Statement in that the proposal would, if permitted, be unduly prominent in the landscape; would result in a suburban style build-up of development when viewed with existing and approved buildings; and would therefore result in a detrimental change to the rural character of the countryside.
4. The proposal is contrary to paragraph 6.71 of the Strategic Planning Policy Statement and Policy CTY 15 of Planning Policy Statement 21: Sustainable Development in the Countryside, in that the proposal would, if permitted, mar the distinction between the settlement and the surrounding countryside and would lead to urban sprawl.
5. The proposal is contrary to Planning Policy Statement 3, Access, Movement and Parking, Policy AMP 2, in that it has not been demonstrated that the proposal would not prejudice road safety of significantly inconvenience the flow of traffic.