



Supporting Statement

Application Ref: LA01/2021/0063/F

Description: Farm diversification project to accommodate 2 no. Glamping pods utilising existing access, parking, and pedestrian field access.

This statement is being provided by way of rebuttal the suggested reasons for refusal as outlined in the planning case officers report dated January 2023.

Reason 1:

The proposal is contrary to 6.73 of the Strategic Planning Policy for Northern Ireland (SPPS) and Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement and does not integrate sympathetically with its surroundings.

Rebuttal:

- *The client could accommodate a 500sqm shed on this same location with greater impact.*
- *This is a glamping proposal; glamping pods are not suitable to be located in a settlement by their very nature.*
- *PPS 21 is intended to offer a means of facilitating development in the countryside, not stifle it and the very nature of this development (being a farm diversification project) means that, in simple terms, it cannot be located within a settlement. The provision of small tourism-based developments like this are essential to the sustainability of the rural economy, especially in exposed parts of the north coast region where agriculture is, but where difficult tourism is a significant part of the economy and were supply lags far behind demand for holiday accommodation.*
- *We suggest that the application drawings and images provided overleaf clearly show that the development will integrate with its surroundings. The existing farm dwelling and associated shed provide a significantly scaled backdrop to the proposed development which is dwarfed in comparison.*

Reason 2:

The proposal is contrary to 6.73 of the Strategic Planning Policy for Northern Ireland (SPPS) and Policy CTY 11 of Planning Policy Statement 21, Sustainable Development in the Countryside in that the proposal is not appropriate in this location and would have a detrimental impact on the natural heritage.

Rebuttal:

It is difficult to understand the rationale offered by the planning team for saying that that the proposal is not appropriate in this location. A much larger proposal for 7no. glamping pods LA01/2018/1556/F was approved in 2020 by CC&G council on a site less than 1 mile away on the Fairhead Road. Furthermore, a proposal for 2no. glamping pods LA01/2021/0057/F, less than 500m from the application site, was approved in 2021.



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By their very nature, glamping pods have minimal impact on their surroundings, visually they are unobtrusive and require little in the way of infrastructure to support them. The emphasis is on blending with and integrating into the natural environment, so to suggest that the proposal will have a detrimental impact on the natural heritage of the area is, we suggest, a complete misreading of the development proposal. Additionally and to reiterate a 500sqm shed can be built in the same location under permitted farm development.

Reason 3:

The proposal is contrary to Paragraph 6.77 of the Strategic Planning Policy for Northern Ireland (SPPS) and Policy CTY13 of Planning Policy Statement 21, Sustainable Development in the Countryside, in that the proposed site lacks long established natural boundaries/ is unable to provide a suitable degree of enclosure for the building to integrate into the landscape and therefore would not visually integrate into the surrounding landscape and it relies primarily on the use of new landscaping for integration.

Rebuttal:

In section 5.58 of PPS 21 it states, "Landscapes vary, and this needs to be taken into account. The determination of whether a new building integrates into the landscape is not a test of invisibility; rather it requires an assessment of the extent to which the development of the proposed site, including necessary site works, will blend in unobtrusively with its immediate and wider surroundings."

We suggest that the development proposal meets this criterion and is clearly demonstrated by the photomontages provided overleaf. The way in which the glamping pods are positioned in relation to the existing farm buildings ensures that there is no impact on the skyline, and they are not intrusive in either short- or long-range views of the site. This is further helped by the way the land undulates up and away from the application site. Given the geographically exposed nature of the location -proposed planting is designed to be sympathetic and create a quality environment, not screen the proposal. The surrounding built form and undulations enable integration from the outset.

Reason 4:

The proposal is contrary to Paragraph 6.260 of the Strategic Planning Policy for Northern Ireland (SPPS) and Policy TSM 7 of Planning Policy Statement 16, Tourism in that the buildings lack appropriate boundary treatment and means of enclosure, and would detract from the landscape quality and character of the surrounding area, and may detrimentally impact road safety as it has not been demonstrated that the proposed access can be provided to an adequate standard.

Rebuttal:

PPS 16 identifies the following 6 objectives:



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- *facilitate sustainable tourism development in an environmentally sensitive manner;*
- *contribute to the growth of the regional economy by facilitating tourism growth;*
- *safeguard tourism assets from inappropriate development;*
- *utilise and develop the tourism potential of settlements by facilitating tourism development of an appropriate nature, location and scale;*
- *sustain a vibrant rural community by supporting tourism development of an appropriate nature, location and scale in rural areas;*
- *ensure a high standard of quality and design for all tourism development.*

We suggest that the development proposal meets all principles of PPS 16 by offering a modest 2no. glamping pods which helps in a small way to address the tourism demand in the area. We suggest that the proposal is appropriate in nature & scale and will help support the rural community through provision of a high quality glamping experience.

As regards boundary treatment, it is proposed that the boundary treatments be appropriate to the rural location and assist with integration - as opposed to enclosing and screening off the development which would be wholly inappropriate in this location.

High fences may be appropriate for tourism facilities such as caravan parks and the like, which sit in highly trafficked areas, but this proposal is in a remote rural setting where sympathetic post and wire fencing, complemented with gorse & hawthorn hedges are more appropriate means of defining enclosure.

Reason 5:

The proposal is contrary to Paragraph 6.187 to the Strategic Planning Policy Statement and Policy NH 6 of Planning Policy Statement 2, Natural Heritage in that the development, if permitted, would have a detrimental impact upon the character and appearance of the designated Area of Outstanding Natural Beauty.

Rebuttal:

We would contest this assessment of the development proposal, Policy NH 6 sets out three criteria for development to meet, all of which this proposal complies with – namely the siting & scale of the proposal is sympathetic to the character of the AONB in general & this locality in particular, that the development is so modest in scale that it has little to no impact & thus respects features of importance to the character appearance and heritage of the immediate landscape and finally; the development proposes traditional boundary details, fences & vegetation with the pods offering a metal clad finish which is already prevalent in the rural aesthetic.

Key views within the area are located to the north of the proposed development site – along the Fairhead Road, away from the development, so again we reiterate – the proposal will have no impact on the visual appeal of the AONB.

Reason 6:



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The proposal is contrary to Paragraph 6.77 of the Strategic Planning Policy for Northern Ireland (SPPS) and Policy AMP 2 of Planning Policy Statement 3, Access, Movement and Parking in that it has not been demonstrated that the proposed access can be provided to an adequate standard.

Rebuttal:

Following provision of amended drawings to the planning team, DFI Road Service have subsequently approved the proposed access and parking arrangements.



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Existing view looking north along Craigfad Road



Proposed view looking north along Craigfad Road – GLAMPING PODS



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Existing view looking north along Craigfad Road



PERMITTED DEVELOPMENT view looking north along Craigfad Road
