

My name is Pdraig Mc Alister and I am here to speak to you on behalf of my brother Daniel who is the applicant.

We are from a local family which has lived at Kilnadore Road for four generations. Daniel has always recognised the importance of the tourist industry to the area and is now in a position to make his contribution to it by way of providing a high-quality guest facility in the Glens. It will be entirely financed by himself and is not dependent on any public finance. Detailed information of the applicant's finances have been issued to the Planning Department in relation to this.

His proposal will offer excellent modern accommodation along with the hospitality for which the Glens is renowned in a building which, in the planning case officers own words .... **“is compatible with surrounding land uses and will not detract from the character of the surrounding area”**.

Firstly this application has been with Causeway Coast and Glens Planning Department for 18 months since August 2022.

The case officer has recommended the application for refusal under PPS16-Tourism and in particular TSM3 and TSM7.

The Planning department propose to refuse the application on two grounds:

1. There are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.
2. The proposal is not located on the periphery of a settlement and it has not been fully demonstrated that there is no suitable site within a settlement.

#### In response to Reason 1:

The agent has carried out two detailed and exhaustive searches of sites and land within the settlement, nearby settlements and on the edge of the settlement in August 2022 and again in April 2023. This involved site visits, desktop searches and discussions with local estate agent. All sites and land were either unavailable, unsuitable (with reasons provided) or sale agreed. This search included 8 areas of land zones for housing, 13 properties within the settlement, 6 properties in nearby settlements, 2 properties possibly suitable for re-use conversion, and lands on the edge of the settlement. All this information has been submitted to the Planners.

The case officer's report mentioned two properties namely *'9b Kilmore Road and 11 Chapel Road'* which *'may be suitable for conversion.... Supporting information such as evidence or access or parking issues has not been provided prove that the existing buildings are not suitable for conversion or replacement.'*

Within our detailed search of suitable sites/properties, we visited both these properties to review suitability. No 9b Kilmore Road is unsuitable as it has one parking space and is accessed off a laneway (stoney lonan) with an unsafe access to the main public road. No 11 Chapel Road was not suitable in size, has very limited amenity space, and again has one parking space with poor and unsafe access onto Chapel Road. The reasons for unsuitability of both properties was submitted to the planning department on 30<sup>th</sup> May 2023 and at no point did the Planning department request any additional information on these properties. If they had done so, we would have happily provided further detail to meet their concerns. We would point out that there are other issues besides parking, example disabled access, room sizes required by NITB etc.

We have proven, arguably to a great extent, that the proposal could not be located within a settlement.

#### In responses to Reason 2:

The Planning department has stated that the proposal is not located on the periphery of a settlement. The Planning legislation under TSM 3 has no reference to measurable distance to define 'periphery' of a settlement'.

Examples of approval on the periphery of settlements which have been granted planning approval vary greatly as can be observed by undernoted cases:

1. Within Causeway Coast and Glens Planning Department under LA01/2018/0077/O a hotel was granted approval for some 200m from the settlement of Bushmills.
2. In a PAC decision 2020/E0041, Commissioner Donaghy states in the appeal 'the appeal development is within 500m of the village of Carrowdore and is therefore close to the edge of an urban area'.

Both of these interpret very different interpretations of 'the periphery of a settlement'.

Also on the same road as the proposed site; holiday glamping pods are located which are 500m from the settlement; at 68 and 68A Ballyeamon Road there are two holiday apartment more than 1000m from the settlement periphery.

There is no measurable definition of 'periphery' in the planning legislation and the distance is subject to the case officer's interpretations, which seem to vary.

The case officer has stated in their report that the site is not considered to be visibly linked with the settlement - there is no requirement whatsoever in the planning policy for a visual link with the settlement.

The case officer does confirm that the proposal meets the following planning policies:

- the project is a 'firm proposal' and is satisfied the applicant will be self-funding the project.
- it is evident from the information provided that other sites have been considered, within the settlement, nearby settlements and land on the edge of the settlement.
- the proposed development is of appropriate design, scale and size for the locality and respects the setting in the AONB in accordance with PS2.
- the development is considered to comply with the design guidance for development within the Antrim Coast and Glens AONB outlined in the design guide in accordance with PS2.
- the development aided by existing trees and vegetation and is not unduly prominent due to the existing landform and buildings and existing mature vegetation in accordance with CTY13
- the proposal is in keeping with the surrounding development and the AONB in accordance with CTY13
- the design involves the use of traditional materials and external finishes and complies with CTY13
- Given the size, location and siting the proposal will not be prominent on the landscape and not result in the detrimental change to the character of and will not result in suburban style of build-up in compliance with CTY14.
- There are no objections from any Consultees; including Environmental Health, HED, DFI Roads, NI Water or DAERA.

Finally in their own words 'Causeway Coast and Glens Council have a major role to play in the development of the tourism industry in the borough and in promoting Causeway Coast and Glens to key target markets and to support our tourism operators and encourage new businesses to be more competitive and innovative.

We have submitted comprehensive information to prove that the project complies with TSM3 and TSM7. To conclude, we submit that this application fulfils all the requirements of the various policies and the planner's objection are weak and are not evidence based.

We do not accept the planner's recommendation to refuse the application and subsequently request the planning council's approval of the application.