



<b>Title of Report:</b>	<b>Planning Committee Report – LA01/2023/0815/F</b>
<b>Committee Report Submitted To:</b>	<b>Planning Committee</b>
<b>Date of Meeting:</b>	<b>22<sup>nd</sup> November 2023</b>
<b>For Decision or For Information</b>	<b>For Decision</b>
<b>To be discussed In Committee YES/NO</b>	<b>NO</b>

<b>Linkage to Council Strategy (2021-25)</b>	
Strategic Theme	Cohesive Leadership
Outcome	Council has agreed policies and procedures and decision making is consistent with them
Lead Officer	Development Management and Enforcement Manager

<b>Budgetary Considerations</b>	
Cost of Proposal	Nil
Included in Current Year Estimates	NO
Capital/Revenue	N/a
Code	N/a
Staffing Costs	N/a

<b>Legal Considerations</b>	
Input of Legal Services Required	NO
Legal Opinion Obtained	NO

<b>Screening Requirements</b>	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals.		
Section 75 Screening	Screening Completed:	No	Date:

	EQIA Required and Completed:	No	Date:
Rural Needs Assessment (RNA)	Screening Completed	No	Date:
	RNA Required and Completed:	No	Date:
Data Protection Impact Assessment (DPIA)	Screening Completed:	No	Date:
	DPIA Required and Completed:	No	Date:

**No:** LA01/2023/0815/F

**Ward:** PORTRUSH AND DUNLUCE

**App Type:** Full Planning

**Address:** Royal Portrush Golf Club, Dunluce Road Portrush BT56 8JQ

**Proposal:** Modifications to Royal Portrush Golf Course to include new holes, greens and tee boxes and fairway realignments on the Valley Course and regrading, new tees, enlargement to infrastructure and spectator areas, alterations to the practice ground and the addition and realignment of internal roads in and around the Dunluce course in preparation for The Open in 2025 and future major Golf Championships. Retention of timber gates on Bushmills and Dunluce Road frontages.

**Con Area:** n/a

**Valid Date:** 04.08.2023

**Listed Building Grade:** n/a

**Target Date:** 01.03.2024

**Agent:** Gravis Planning, Unit 1, Pavilions Office Park, Kinnegar Drive, Holywood

**Applicant:** Royal Portrush Golf Club and R&A Championships Ltd

**Objections:** 0      **Petitions of Objection:** 0      **Comments** 0

**Support:** 1      **Petitions of Support:** 0

## **Executive Summary**

- This proposal is considered acceptable at this location having regard to the Northern Area Plan 2016 and all other material considerations.
- Royal Portrush Golf courses are located in the Countryside as Designated in the Northern Area Plan 2015. The site is also within the Causeway Coast Area of Outstanding Natural Beauty, Royal Portrush Landscape Policy Area and Portrush Golf Links Site of Local Nature Conservation Importance. The site is hydrologically linked to the Skerries and Causeway SAC and adjacent to the Whiterocks ASSI.
- The site comprises the existing golf courses of circa 154 hectares. The application specifically seeks permission to reconfigure/ alter several holes on the Dunluce and Valley courses, and modification of the practice area. Proposed works will include roads and significant earthworks and retention of timber gates on Bushmills and Dunluce Road frontages.
- This is a Major application that was accompanied by a Community Consultation Report and a Design and Access Statement
- One letter of support has been received in relation to the application.
- No concerns have been raised by statutory consultees in relation to this proposal.
- The proposal complies with all relevant planning policies including the Northern Area Plan 2016, the SPPS, PPS 2, PPS 6, PPS 8, PPS 15 flood risk, PPS16, and PPS 21.
- Approval is recommended subject to conditions.

**Drawings and additional information are available to view on the Planning Portal- <https://planningregister.planningsystemni.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 **APPROVE** full planning permission subject to the conditions set out in section 10.

## **2 SITE LOCATION & DESCRIPTION**

- 2.1 The application site comprises Royal Portrush Golf Club, which includes 2, 18-hole golf courses. The site is circa 154ha.
- 2.2 The site is located east of the settlement development limit of Portrush. It is within Royal Portrush Landscape Policy Area and Portrush Golf Links Site of Local Nature Conservation Importance. The site is hydrologically linked to the Skerries and Causeway SAC and is within an Area of Outstanding Natural Beauty (AONB).

## **3 RELEVANT HISTORY**

- 3.1 C/2014/0486/F: Lands at Royal Portrush Golf Club and environs, Dunluce Road, Portrush. Proposed modifications to Royal Portrush Golf Club to include new holes on its Dunluce, Valley and Skerries courses, adjustments to existing holes, new plant and machinery compound, new service road accesses, extension to existing service road network and associated infrastructure. Permission Granted 25.03.2015

LA01/2023/0503/PAN: Lands at Royal Golf Club, Dunluce Road, Portrush. Modifications to Royal Portrush Golf Course to include new holes, green and tee boxes and fairway realignments on the Valley Course and regrading, new tees, enlargement to infrastructure and spectator area, alterations to the practice ground and the addition and realignment of internal roads in and around the Dunluce Course in preparation for The Open in 2025. PAN complete 08/06/23.

LA01/2023/0613/PAD. Lands at Royal Portrush Golf Club, Dunluce Road, Portrush. Modifications to Royal Portrush Golf Course to include new holes, greens and tee boxes and fairway realignments

on the Valley Course and regrading, new tees, enlargement to infrastructure and spectator areas, alterations to the practice ground and the addition and realignment of internal roads in and around the Dunluce course in preparation for The Open in 2025 and future major Golf Championships. PAD concluded 25/08/23.

## **4 THE APPLICATION**

4.1 The application seeks full permission to reconfigure/ alter several holes on the Dunluce and Valley courses, and modification/ extension of the practice area. The works will improve the visitor and Golfer experience for the Open 2025. Proposed works will include roads and significant earthworks. A summary of the works undertaken is set out within the submitted Design & Access Statement. They include;

### Dunluce Course

- 2nd Hole – minor reprofiling to create a small dune in the area between the 2nd fairway and 12th green to the north to create visual separation.
- 3rd Hole – regrade the level area south of the tee box northwards to create an enlarged spectator area. A new tarmac road is proposed through the Club's existing turf nursery which will again be used as a contractor compound during The Open in 2025.
- 4th Hole – construction of a new back Championship tee over existing area of hardstanding and realignment of tarmac road through this area. Enlargement of existing spectator area NW of the 4th green.
- 17th Hole – enlargement of existing spectator area to the east of the 17th tee box with reprofiling of surrounding embankments to provide screening of this area.

### Club practice area

- Enlargement of practice tee at the western end of the Club practice area to include the area currently occupied by the 3rd tee on the Valley Course.
- Widening and levelling of the existing practice area

- Realigned internal roads along the northern and south-eastern perimeter of the enlarged practice area.

#### Valley Course

- 2nd Hole – fairway slightly rerouted to the west and hole extended by c. 80m with the creation of a new green.
- 3rd Hole – Formerly the 4th hole, areas of the fairway are to be reprofiled to provide practice target greens for use during The Open. The area of rough on the NW side of the fairway is to be regraded to provide visual separation from the 4th hole.
- 5th hole – The existing green is to be moved extending the hole by c.100m.
- 6th hole – Creation of an elevated dune to accommodate new tee boxes for this new hole (formerly occupied by the 7th) which also has a new green.
- 7th, 8th and 9th holes – currently occupied by the Skerries short course, this area will be reprofiled to create 3 new holes.

## **4.2 Design & Access Statement**

4.3 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.

4.4 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.

4.5 The report date received 4th August 2023 demonstrates that the applicant undertook detailed consideration of the proposal in terms of the design principles and concepts. Impacts on natural and built heritage have also been considered.

## **Environmental Impact Assessment**

4.6 This proposal was subject to an environmental impact assessment screening as required by The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.

4.7 The application is considered to fall within Schedule 2: Category 12 (d) of the Regulations- Tourism and Leisure, Themes Parks. This is clarified in the Interpretation of definitions of project categories of Annex I and II of the EIA Directive. As the site is located within a sensitive area, namely the Causeway Coast Area of Outstanding Natural Beauty, the thresholds do not apply.

4.8 Having considered the Regulations, it was determined on 15/11/23 the development proposal would not have any likely impacts of such a significance to warrant submission of an environmental statement.

## **5 PUBLICITY & CONSULTATIONS**

### **External**

5.1 Neighbours: 1 letter of support.

1 letter of support has been submitted. It includes the following points:

- Improvements are vital and are for the benefit of the local community as well as to aid the hosting of the 2025 Open.
- When Portrush previously hosted the Open it led to an uptake in memberships of golf clubs across Ireland.
- The previous Open shone a light on the natural beauty and opportunities of the location, attracting investment from around the world.

### **Internal**

5.2 DAERA Marine and Fisheries Division: No objections

DAERA NED: No objections

DAERA WMU: No objections

DfC Historic Environment Division: No objections

DfI Rivers: No objection.

DfI Roads: No objection

Environmental Health: No objection

Shared Environmental Services (SES): No objections

NI Water: No objection.

Northern Ireland Tourist Board: No objections

### **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 received on 12th May 2023 under LA01/2023/0503/PAN.

5.5 Members of the community were consulted on the proposal by press advertisement in Coleraine Chronicle on 29th June 2023.

5.6 Two drop in sessions were hosted at the Royal Portrush Golf Club on 6th July 2023.

### **Community Consultation Report**

5.7 The community consultation report (CCR) was submitted as part of the planning application, received on 14th August 2023 which is more than 12 weeks after the Proposal of Application Notice was received, as required by the legislation.

5.8 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.

5.9 A public consultation event was held on 6th July 2023 at the Royal Portrush Golf Club between 12-2pm and 4-8pm. A total of eleven people attended. The CCR summarises responses received from stakeholders, most of which were positive.

5.10 The CCR demonstrates that adequate community consultation has taken place and that 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 (PPS6): Planning, Archaeology and Built Heritage

Planning Policy Statement 8 (PPS8): Open Space, Sport and Outdoor Recreation.

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

Planning Policy Statement 16 (PPS16): Tourism

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

UK Marine Policy Statement

Draft Marine Plan for Northern Ireland

Other Material Considerations

Causeway Coast and Glens Tourism and Destination Management Strategy 2015 – 2020

Recovery and Renewal- An Economic Strategy for the Causeway Coast and Glens.

## **8 CONSIDERATIONS & ASSESSMENT**

8.1 The main considerations in the determination of this application relate to planning policy, principle of the development, flood risk and drainage, impact on coastal processes, natural heritage, archaeology and built heritage, Habitats Regulation Assessment, Tourism and Economic impact, access movement and parking and visual impact.

### **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 The site is located east of the settlement development limit of Portrush. It is within Royal Portrush Landscape Policy Area and Portrush Golf Links Site of Local Nature Conservation Importance. The site is hydrologically linked to the Skerries and Causeway SAC and is within the Causeway Coast Area of Outstanding Natural Beauty (AONB).

8.4 Policy ENV 1 of the Nap 2016 states that planning permission will not be granted for development proposals that would be liable to

affect adversely those features, or combination of features, that contribute to the environmental quality, integrity or character of a designated LLPA.

8.5 Policy ENV 2 of the NAP 2016 states planning permission will not be granted for development that would be liable to have a significant adverse effect on the intrinsic nature conservation interest of a designated Site of Local Nature Conservation Importance (SLNCI).

8.6 The Strategic Planning Policy Statement (SPPS) for Northern Ireland sets out under 'Sustainable Development in the Countryside' that other types of development in the countryside, other than those set out in the policy, should be considered as part of the development plan process in line with the other policies set out within the SPPS. These policies are considered below.

### **Principle of development**

#### Development in the Countryside

8.7 This proposal is for the reconfiguration of the existing golf courses at Royal Portrush to open the courses and in preparation for hosting the 2025 Open.

8.8 Policy CTY 1 of PPS 21 states that there are a range of types of non-residential development that may be acceptable in principle in the countryside. Other types of development will only be permitted where there are overriding reasons why that development is essential and could not be located in a settlement, or it is otherwise allocated for development in a development plan. Proposals for such development will be considered in accordance with existing published planning policies.

8.9 The application seeks full permission to reconfigure/ alter several holes on the Dunluce and Valley courses, and modification of the practice area. Works will include roads and significant earthworks and retention of timber gates at 5 entrances onto Dunluce Road. The works represent improvements to existing and established golf courses. Policy CTY1 of PPS 21 states that permission will be granted for outdoor sport and recreational uses in accordance with PPS 8.

## Outdoor Recreation in the Countryside

8.10 Policy 0S 3 of PPS 8 states that the Council will permit the development of proposals for outdoor recreational use in the countryside where all the following criteria are met:

*(i) there is no adverse impact on features of importance to nature conservation, archaeology or built heritage;*

8.11 The site is within Portrush Golf Links Site of Local Nature Conservation Importance. The site is hydrologically linked to the Skerries and Causeway SAC and adjacent the Whiterocks ASSI. DAERA, Natural Environment Division (NED) and SES have considered the impacts of the proposal on designated sites and are content that the proposal will not have an adverse impact on these sites. Further consideration is set out in the Natural Heritage section below.

8.12 There are several identified archaeological sites within the red line of the application; 2 tomb sites, 3 settlement sites and a burial site. HED was consulted during the processing of the application and is content that the proposal is satisfactory to the SPPS and PPS 6 archaeological policy requirements, subject to a condition requiring the implementation of developer-funded programme of archaeological works.

*(ii) there is no permanent loss of the best and most versatile agricultural land and no unacceptable impact on nearby agricultural activities*

8.13 The works are to be carried out within existing established golf courses and therefore will not result in the loss of any agricultural land. The golf courses are long established and there will be no unacceptable impacts on nearby agricultural activities.

*(iii) there is no adverse impact on visual amenity or the character of the local landscape and the development can be readily absorbed into the landscape by taking advantage of existing vegetation and/or topography;*

8.14 The site is within the Royal Portrush LLPA. Features or combination of features that contribute to the environmental quality,

integrity or character of this area are detailed in the NAP 2016 as; This area is dominated by Curran Strand, commonly known as East Strand and the related extensive sand dunes and the slopes rising behind, provides one of the most memorable vistas along the North Coast, especially when approaching Portrush from the east. This area is also within the Causeway Coast AONB. It also contains the Portrush Golf Links SLNCI. The works to be undertaken include the reconfiguration of parts of the established courses and some changes in hard standing and roads. Once the works have been completed and the site matured, which is likely in a short timeframe, there will be no significant visual impact.

- 8.15 There is an existing Club House, access and car parking associated with the golf course. No additional buildings are proposed.

*(iv) there will be no unacceptable impact on the amenities of people living nearby;*

- 8.16 The nearest residential dwellings are located on Bushmills Road, which are adjacent to parts of the golf courses. Given the size of the site, and the distance to sensitive receptors from the proposed earthworks, it is not considered that the proposal will have a significant impact upon surrounding amenity during the construction phase. When the site is operational it will create no greater impact than the existing, unimproved facility.

- 8.17 The Environmental Health Department was consulted and stated that they have no adverse comments pertaining to the application.

*(v) public safety is not prejudiced and the development is compatible with other countryside uses in terms of the nature, scale, extent and frequency or timing of the recreational facilities proposed;*

- 8.18 The golf courses are existing and established, and the development seeks to improve them. Provided the developers adhere to best practice in terms of health and safety during construction, there will be no adverse impacts on public safety.

*(vi) any ancillary buildings or structures are designed to a high standard, are of a scale appropriate to the local area and are sympathetic to the surrounding environment in terms of their siting, layout and landscape treatment;*

8.19 There are no ancillary buildings or structures proposed under this application.

*(vii) the proposed facility takes into account the needs of people with disabilities and is, as far as possible, accessible by means of transport other than the private car.*

8.20 The golf club is situated in the edge of the Portrush settlement and accessible to both the Train and Bus Station. The proposal is within walking distance of the town centre. The proposed works are to also improve the spectator access and facilities for the Open.

*(viii) the road network can safely handle the extra vehicular traffic the proposal will generate and satisfactory arrangements are provided for access, parking, drainage and waste disposal;*

8.21 It is not anticipated that, aside from during the Open, that the proposed works will create extra vehicular traffic, as the capacity of the courses will not change. Satisfactory arrangements are provided for access, parking, drainage and waste disposal. DFI Roads was consulted on the proposal and have no objections.

### **Flood Risk and Drainage**

8.22 The Strategic Flood Map (NI) indicates that the site lies partially within the 1 in 200 year coastal flood plain along the northern boundary. However, this site is well elevated and at variance with the strategic flood map, hence DfI Rivers do not object to the proposed development from a drainage or flood risk perspective. As the proposal concerns the alteration of land used for sport and outdoor recreation it is considered an exception under Policy FLD1. A Flood Risk Assessment has been submitted which demonstrates that all sources of flood risk have been identified and it is not anticipated that the works will increase flood risk. Proposal is compliant with FLD1.

8.23 Policy FLD 2 refers to Protection of Flood Defence and Drainage Infrastructure. Documents titled, MCL Consulting Letter re DFI Consultation Response and Drainage Routing, show adequate measures for maintenance strips to be provided along both culverted and open sections of undesignated watercourses within the site, therefore FLD2 is satisfied.

8.24 A drainage assessment was submitted in accordance with Policy FLD3: Development and Surface Water (Pluvial) Flood Risk Outside Flood Plains. The submitted Drainage Assessment states: all existing internal roadways within the golf course exist without any drainage features or collections and are simply diverted onto adjacent grass areas where they infiltrate immediately at source...It is proposed these existing regimes will continue post development...Although, detailing of soakaways are beyond the remit of a Drainage Assessment, and outside the scope considered by Dfl Rivers, in this instance direct infiltration at source is adequate for existing, and it is anticipated that no detrimental impact will occur due to the proposals. The DA indicates that flood risk to and from a portion of the development will be managed using SuDS. The drainage system proposed has no outlet and drainage is via percolation through the soil strata.

8.25 Commenting on the efficacy of the proposed SuDS is outside Dfl Rivers' area of knowledge and expertise. Consequently, Dfl Rivers cannot advise of the potential flood risk to the development, and from the development to elsewhere, has been satisfactorily addressed, or that the proposal is acceptable as required under policy. Details of site hydrology, greenfield runoff, managing surface water runoff and Greenfield runoff estimations have been provided in the Drainage Assessment. It is the opinion of the Planning Authority that the Drainage assessment and SuDS have been prepared by competent persons at MCL Consulting. Therefore, adequate measures will be put in place so as to effectively mitigate flood risk. Policy FLD3 is satisfied.

8.26 Policy FLD5 Development in Proximity to Reservoirs : The site is in an area of potential inundation from Craighuluar Ballinees Reservoir. The reservoir has Responsible Reservoir Manager status thus DFI Rivers do not object to the proposal from a reservoir flood perspective. Policy FLD5 is satisfied.

### **Impact on Coastal Processes**

8.27 The site forms part of the existing dune system and is located in very close proximity to the sea. The application site is located within the Skerries and Dunluce Coast Regional seascape Character Area. Sections 2.6.7.4 and 2.6.8.5 of the Marine UK Policy Statement are relevant. The policy aims to prevent inappropriate types of development in areas most vulnerable to

coastal change while also improving resilience of existing developments to long term climate change. Marine and Fisheries advised that due to its location, climate change, and the dune system being dynamic and subject to change that the proposed works to holes 7, 8 and 9 may result in these areas becoming more vulnerable to coastal retreat in the future. The proposal includes cutting and relocating areas of dune and sediment in close proximity to the seaward boundary, with the potential to reduce the stability of the sand dune within this dynamic zone.

8.28 NIEA Marine and Fisheries Division, Marine Conservation Branch, had concerns regarding the resilience of the proposal to coastal retreat and impact to the integrity of the sand dune as a result of cutting areas of dune system. Marine and Fisheries also sought evidence that the Core Policy on Climate change had been considered and applied.

8.29 Further to the initial consultation response from Marine and Fisheries, a Geomorphology Technical Memo was submitted on 09/10/23. Matters were further clarified in a meeting with the Council, DAERA and the Architect, Agent, and representatives from the Open and Royal Portrush Golf Club, on 01/11/23.

8.30 Marine Conservation Branch considered this information and advised that they are content that the Technical Memo shows that the proposed application will result in the realignment of several holes at the Valley/Rathmore Golf Course with the main playable elements of the 7th, 8th and 9th holes being located further away from the coastline than what is currently existing. Furthermore, the Technical Memo also indicates that the proposed re-grading of the dune system required for the 7th, 8th and 9th holes will result in a net accumulation of c. 158 m<sup>3</sup> of sediment for this area. Following assessment of all the information presented, Marine Conservation Branch are content that their concerns have been addressed and have no objection to the proposal.

8.31 The Planning Department has reviewed the response from Marine Conservation Branch and consider that the proposal is acceptable with regard to its impact on coastal processes and compliance with the Marine policies.



## **Natural Heritage**

### Designated Sites

- 8.32 The application site is hydrologically linked to Skerries and Causeway SAC, the North Channel SAC and the Maidens SAC. The site is also adjacent to the Whiterocks ASSI.
- 8.33 NIEA Natural Environment Division (NED) and Marine Team have considered the impacts of the proposal on designated sites. They have advised that provided standing advice for development that may have an effect on the water environment is adhered to they do not anticipate significant impacts to the special areas of conservation.
- 8.34 The Planning Department is content that the proposal is in compliance with Policy NH1 of PPS2 as the development, either individually or in combination with existing and/ or proposed plans, is not likely to have significant affect on a European site.
- 8.35 Policy NH3 is satisfied as no development is proposed within the adjacent ASSI, NED are content the no impacts to the designated ASSI site features are likely.

### Areas of Outstanding Natural Beauty

- 8.36 The site is located within an Area of Outstanding Natural Beauty. Paragraph 6.187 of the SPPS and Policy NH 6 of PPS 2 requires development proposals in Areas of Outstanding Natural Beauty to be sensitive to the distinctive special character of the area and the quality of their landscape, heritage and wildlife.
- 8.37 The development will take place on existing golf courses, which are long established. Once the areas of work grow in and mature the site will be visually indistinguishable from the existing, unimproved facility. Additionally, the works will result in a net gain in priority habitat. The proposed works are of an appropriate design, scale and size for the locality and will not adversely affect the character, appearance, or heritage of the landscape.

### Priority Habitats

- 8.38 The application site encompasses a Site of Local Nature Conservation Importance (SLNCI) Portrush Golf Links', is in

proximity to designated sites and contains priority habitat. Paragraph 6.190 of the SPPS and Policy NH 4 of PPS 2, Natural Heritage, states that planning permission will only be granted for a development proposal that is not likely to have a significant adverse impact on a Site of Local Nature Conservation Importance.

Paragraph 6.183 of the SPPS and Policy NH 3 of PPS 2 states that planning permission will only be granted for a development proposal that is not likely to have an adverse effect on the integrity or special interest of designated sites. Paragraph 6.192 of the SPPS and Policy NH 5 of PPS 2 states that planning permission should only be granted for a development proposal which is not likely to result in an unacceptable impact on; or damage to known priority habitats.

8.39 This proposal has the potential to have an adverse impact on the following Annex I Marine habitats by causing pollution via suspended sediments, construction materials and chemicals and construction vehicles and machinery pollutants during clearance, construction and maintenance works:

- (Adjacent) Mudflats and sandflats not covered by seawater at all times.
- (~0.46km) Reefs
- (~0.26km) Submerged sandbanks

Marine and Fisheries Division stated in their response that, provided standing advice for development that may have an effect on the water environment (including groundwater and fisheries) is adhered to, we do not anticipate any significant impacts to these marine habitats.

8.40 Following the submission of further information, including a Construction Methodology, Natural Environment Division is content that the development would be unlikely to significantly impact priority habitats during the construction works.

8.41 The following Annex 1 Priority Habitats were recorded, around the 9 proposed work areas, following Habitat Surveys conducted by the Applicant.

- Open Dune
- Dune Grassland
- Dune Scrub

- 8.42 As the proposal plan involves lifting areas of fixed dune habitat and either re-laying it in the same area following the completion of localised cut and fill, or relocating it to areas that support poorer quality habitat, NED sought clarification and Habitat Monitoring Reports assessing the success of the Translocation Plan associated with the previous approval (C/2014/0486/F), which included similar works.
- 8.43 Following the submission of the requested reports and clarification, NED state, given the success of the translocation works undertaken in 2015, NED would therefore have confidence that the proposed new works will result in favourable dune habitat creation, and that there will be gain of NIPH (Northern Ireland Priority Habitat), rather than any loss. Provided a condition is included in any planning approval to ensure the works are carried out as described in the HMP methodology, NED have no concerns regarding loss of NIPHS.
- 8.44 The Planning Department considers the proposal to be acceptable in terms of impact to habitats and in compliance with Policy NH5 of PPS2.

#### Priority Species

- 8.45 Policy NH2, Species Protected by Law, of PPS2 states that Planning permission will only be granted for a development proposal that is not likely to harm a European protected species. Policy NH2 goes on to state 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.
- 8.46 The proposed areas of work contain priority habitats which have the potential to host protected species: Birds, Bats, Otters, Badgers, the Common Lizard and Smooth Newt.
- 8.47 NED notes that the otter and badger surveys found no evidence of otters (holts, spraints, tracks, feeding sites or couches) or badgers (sett entrances, tracks, hair or latrines) on site. NED welcomes the good practice mitigation measures listed in Section 7.2 Mitigation Summary of the Preliminary Ecological Appraisal, May 2023, that will be implemented to protect any otters or badgers that may enter the construction site. Providing a condition is included in any planning approval to ensure that these measures are implemented, NED has no concerns regarding impacts to these species.

Bird surveys and a bat roost potential survey was carried out. Ned are content that they will be no impact on these species subject to vegetation and works being carried outside of the bird breeding season.

8.48 NED states, potential impacts to newts will be minimised by ensuring that no works, except for *Crassula helmsii* removal, take place within 10m of any watercourse or waterbody. Providing a condition is included in any planning approval to ensure that this measure is implemented, NED has no concerns regarding impacts to smooth newts.

8.49 NED notes that CEDaR have no common lizard records within 2km of the site, and the NBN Atlas Northern Ireland website holds no additional lizard records within 5km of the site. They accept that the submitted Common Lizard survey recorded no lizards nor any evidence of their presence was observed throughout the four site visits. Though the survey did not fully comply with NIEA NED survey specifications, following discussion with NED they are content to proceed with approval referencing the Wildlife Order, that works would cease immediately if any evidence of the Common Lizard is on site. They have provided an informative highlighting the protection afforded to the Common Lizard and best practice when working on or near suitable habitat.

8.50 The Planning Department considered the proposal to be in compliance with Policies NH1, NH2, NH4 and NH5 of PPS2.

### **Archaeology and Built Heritage**

8.51 The application site contains six archaeological sites recorded on the Northern Ireland Sites and Monuments Record (NISMR) protected under Policy BH2 of PPS6.

8.52 Historic Environment Division has assessed the application and on the basis of the information provided is content that the proposal is satisfactory to SPPS and PPS 6 policy requirements. Their assessment is subject to conditions stipulating that the works must be in accordance with the agreed Archaeological Programme of Works and the submission of an archaeological report within 12 months of the completion of archaeological works, as per Policy BH4 of PPS6.

8.53 The Planning Department considers the proposal to satisfy Policies BH2 and BH4 of PPS6.

### **Habitat Regulations Assessment**

8.54 This planning application has been 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 Council which is the competent authority responsible for authorising the project and any assessment of it required by the Regulations.

8.55 Following an appropriate assessment in accordance with the Regulations and having considered the nature, scale, timing, duration and location of the project, SES advises the project would not have an adverse effect on the integrity of any European site either alone or in combination with other plans or projects, subject to conditions.

8.56 Causeway Coast and Glens Borough Council in its role as the competent authority under the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended), and in accordance with its duty under Regulation 43, has adopted the HRA report, and conclusions therein, prepared by Shared Environmental Service, dated 06/11/2023. This found that the project would not have an adverse effect on the integrity of any European site.

### **Tourism & Economic Impact**

8.57 The Open has been identified within the Council Economic Strategy as a global event which has the potential to be a driving growth sector for the Council. In support of this, the Agent has provided a detailed economic impact study undertaken by Hallam University following the previous Open in 2019. It found that the event injected at least £45 million to the Northern Ireland economy. A further £61m of destination marketing benefit was also measured leading to an overall benefit of more than £100m, or 1.1% of the total growth in the Northern Ireland economy between 2018 and 2019. The event attracted over 237,000 spectators, an entrance record at the time for an Open staged outside of St Andrews. An economic impact of £26m was measured in the CCGBC local authority area alone. Hotels and restaurants were also among the beneficiaries, with 162,000 commercial bed nights generated in the accommodation

sector in Northern Ireland. More than half of attendees (57%) travelled from outside of Northern Ireland, with almost one-fifth (19%) from overseas countries outside the UK and Ireland. There is a clear expectation that the 153rd Open at Royal Portrush in 2025 will result in even greater economic and tourism benefit to the local economy in 2025. It is also projected that the resulting modifications to the Valley course will also increase the length of visitor stays in the area outside of The Open period and beyond.

### **Access Movement and Parking**

8.58 Royal Portrush Golf Course is bound to the south by the Bushmills Road which is a Protected Route. Part of the proposal is for the retention of timber gates to the temporary accesses approved under C/2014/0486/F. The four temporary accesses were approved to facilitate the 2019 Open and were conditioned to be closed and the hedge reinstated following the event. This application is for retrospective permission relating to the gates and access. The proposal is to retain the four temporary accesses, their wooden gates and place in front of the 4 temporary accesses timber planter boxes fixed to the road surface. Policy AMP 3 set out in Annex 1 of PPS21 states that planning permission will only be granted for a development proposal involving access onto a Protected Route in a number of cases. Criteria (d) Other categories of development, is the appropriate criteria for consideration. Criteria (d) requires development to make use of an adjacent minor road or use of an existing vehicular access.

8.59 There are several existing accesses to the course at: Rathmore Club House, Royal Portrush Golf Club and one remote access east of the Royal Portrush Golf Club. The submission states that they require an additional 4 temporary accesses to facilitate the 2025 Open. The principle for the temporary accesses was granted under the previous planning approval. As set out in the TAF the temporary access points, gates 1-4, will be used in the months leading up to the 153rd Open in July 2025 to facilitate the delivery of infrastructure necessary to host the Open and to ensure minimal impact on local traffic flow. These are acceptable in terms of road safety.

8.60 The creation of a new access onto a Protected route is not normally permitted under Policy AMP 3. However, material consideration has been given to their temporary nature, previous temporary approval,

lack of objection from DFI Roads and the Regional tourism and economic importance of the Open 2025. These factors are given greater weight relative to the provisions of Policy AMP 3. A proposed Condition requires installation of the planters at all times except during international golf tournaments.

8.61 The gates at the four temporary access and one existing access are comprised of close boarded timber panels. Though not usually acceptable in the countryside location the golf course is associated visually with built development located on the edge of the settlement and adjacent dwellings and caravan parks. In this case the visual impact, of the access is considered acceptable.

## **9 CONCLUSION**

9.1 The proposal is considered to be acceptable in this location having regard to the Northern Area Plan 2016 and other material considerations including the SPPS, PPS 2, PPS6, PPS8, PPS15 and PPS21. The proposal is considered to represent improvements to the existing golf course and to also facilitate the return of the 153rd Open in 2025. The four temporary accesses and gates are considered acceptable when considered with all other relevant material considerations. The proposal will not have an adverse effect on either the Royal Portrush LLPA or Portrush Golf Links SLNCI designations. The proposal will not have an adverse effect on the environment, visual or residential amenity. Approval is recommended.

## 10 Conditions

1. As required by Section 61 the Planning Act (Northern Ireland) 2011, the development hereby permitted shall be begun before the expiration of 5 years from the date of this permission.

Reason: Time limit.

2. Throughout the construction phase, the appointed contractor must adhere to and implement in full all the mitigation measures detailed in the Final Construction Environmental Management Plan (CEMP) by MCL Consulting dated August 2023. Any changes to the Final CEMP must be submitted in writing to the Council for approval prior to commencement of any works on site.

Reason: To ensure the project will not have an adverse effect on the integrity of any European site

3. The Final Construction and Environmental Management Plan August 2023 (CEMP) shall be implemented in accordance with the approved details and all works on site shall conform to the approved CEMP, unless otherwise agreed in writing by the Planning Authority.

Reason: To protect Northern Ireland priority habitats and species and European Priority Habitat by ensuring implementation of the mitigation measures listed in Table 5 of the CEMP.

4. The Habitat Management Plan October 2023 (HMP) shall be implemented in accordance with the approved details and all works on site shall conform to the methodology set out in the HMP, unless otherwise agreed in writing by the Planning Authority.

Reason: To ensure that suitable compensation for the loss of and damage to Northern Ireland priority habitats is implemented, that the habitats on site are adequately managed and that the management of habitats is monitored so that management can be adapted to cover future issues.



5. Habitat monitoring shall be undertaken on site. Habitat Monitoring Reports shall be submitted in Years 1, 2, 3, 4, 5, 10 and 15 after commencement of works. Monitoring shall detail the success of the translocation and habitat management measures. There shall be provision within the Habitat Monitoring Reports to review and improve failing management.

Reason: To ensure successful habitat establishment and management on site.

6. No pesticides or other toxic agri-chemicals shall be used in any areas other than fairways, greens, tees, areas of amenity grassland and areas where it is required for scrub control.

Reason: To protect Annex 1 European Priority Habitat and breeding birds.

7. No site works of any nature or development shall take place other than in accordance with the agreed Archaeological Programme of Works document dated 2.8.23 and published on the Consultee Hub on 18.8.23.

Reason: to ensure that archaeological remains within the application site are properly identified, and protected or appropriately recorded.

8. A programme of post-excavation analysis, preparation of an archaeological report, dissemination of results and preparation of the excavation archive shall be undertaken in accordance with the agreed Archaeological Programme of Works. These measures shall be implemented and a final archaeological report shall be submitted to Causeway Coast and Glens Borough Council within 12 months of the completion of archaeological site works, or as otherwise agreed in writing with Causeway Coast and Glens Borough Council.

Reason: To ensure that the results of archaeological works are appropriately analysed and disseminated and the excavation archive is prepared to a suitable standard for deposition.

9. The proposed planters located in front of the temporary accesses shown on drawing nos.20, 21, 22, 23 &24 shall be installed within 3 months of the date of decision and only be removed to facilitate the use of the temporary accesses in the months April to

September (inclusive) in the year of any international golf tournament, the planters shall be reinstated following this time.

Reason: To ensure there is a satisfactory means of access in the interests of road safety and convenience of road users.

#### Informatives

1. This approval does not dispense with the necessity of obtaining the permission of the owners of adjacent dwellings for the removal of or building on the party wall or boundary whether or not defined.
2. This permission does not alter or extinguish or otherwise affect any existing or valid right of way crossing, impinging or otherwise pertaining to these lands.
3. This permission does not confer title. It is the responsibility of the developer to ensure that he controls all the lands necessary to carry out the proposed development.
4. This determination relates to planning control only and does not cover any consent or approval which may be necessary to authorise the development under other prevailing legislation as may be administered by the Council or other statutory authority.
5. You should refer to any other general advice and guidance provided by consultees in the process of this planning application by reviewing all responses.
6. The applicant's attention is drawn to the fact that the site is close to Skerries and Causeway Special Area of Conservation (SAC) and White Rocks Area of Special Scientific Interest (ASSI), and precautions should be taken to ensure their integrity will not be damaged by construction vehicles, deposited materials, contaminated run-off, or any other activity during the construction period or thereafter. Any works occurring within the designated sites but outside the red line planning application boundary are subject to The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) and require consent from the Northern Ireland Environment Agency, Conservation Designations and Protection Unit, Klondyke Building, Cromac Avenue, Belfast BT7 2JA.

7. The applicant's attention is drawn to The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended), under which it is an offence:

a) Deliberately to capture, injure or kill a wild animal of a European protected species, which includes the otter (*Lutra lutra*);

b) Deliberately to disturb such an animal while it is occupying a structure or place which it uses for shelter or protection;

c) Deliberately to disturb such an animal in such a way as to be likely to -

i. affect the local distribution or abundance of the species to which it belongs;

ii. Impair its ability to survive, breed or reproduce, or rear or care for its young; or

iii. Impair its ability to hibernate or migrate;

d) Deliberately to obstruct access to a breeding site or resting place of such an animal; or

e) To damage or destroy a breeding site or resting place of such an animal. If there is evidence of otter activity on the site, all works should cease immediately and further advice sought from the Wildlife Team, Northern Ireland Environment Agency, Klondyk Building, Cromac Avenue, Belfast BT7 2JA. Tel. 028 9056 9558 or 028 9056 9557.

8. The applicant's attention is drawn to Article 10 of the Wildlife (Northern Ireland) Order 1985 (as amended) under which it is an offence to intentionally or recklessly:

a) kill, injure or take any wild animal included in Schedule 5 of this Order, which includes the badger (*Meles meles*);

b) damage or destroy, or obstruct access to, any structure or place which badgers use for shelter or protection;

c) damage or destroy anything which conceals or protects any such structure; Natural Environment Division

d) disturb a badger while it is occupying a structure or place which it uses for shelter or protection.

Any person who knowingly causes or permits to be done an act which is made unlawful by any of these provisions shall also be guilty of an offence. If there is evidence of badger on the site, all works should cease immediately and further advice sought from the Wildlife Team, Northern Ireland Environment Agency, Klondyke Building, Cromac Avenue, Belfast BT7 2JA. Tel. 028 9056 9558 or 028 9056 9557.

9. The applicant's attention is drawn to Article 10 of the Wildlife (Northern Ireland) Order 1985 (as amended) under which it is an offence to intentionally or recklessly:

a) kill, injure or take any wild animal included in Schedule 5 of this Order, which includes the common lizard (*Lacerta vivipara*);

b) damage or destroy, or obstruct access to, any structure or place which common lizards use for shelter or protection;

c) damage or destroy anything which conceals or protects any such structure;

d) disturb a common lizard while it is occupying a structure or place which it uses for shelter or protection.

Any person who knowingly causes or permits to be done an act which is made unlawful by any of these provisions shall also be guilty of an offence.

If there is evidence of common lizard on the site, all works should cease immediately and further advice sought from the Wildlife Team, Northern Ireland Environment Agency, Klondyke Building, Cromac Avenue, Belfast BT7 2JA. Tel. 028 9056 9558 or 028 9056 9557.

10. The applicant's attention is drawn to Article 4 of the Wildlife (Northern Ireland) Order 1985 (as amended) under which it is an offence to intentionally or recklessly:

a) kill, injure or take any wild bird; or

- b) take, damage or destroy the nest of any wild bird while that nest is in use or being built; or
- c) at any other time take, damage or destroy the nest of any wild bird included in Schedule A1; or
- d) obstruct or prevent any wild bird from using its nest; or
- e) take or destroy an egg of any wild bird; or
- f) disturb any wild bird while it is building a nest or is in, on or near a nest containing eggs or young; or
- g) disturb dependent young of such a bird.

Any person who knowingly causes or permits to be done an act which is made unlawful by any of these provisions shall also be guilty of an offence.

It is therefore advised that any tree or hedgerow loss or vegetation clearance should be kept to a minimum and removal should not be carried out during the bird breeding season between 1 March and 31 August.

10. The applicant's attention is drawn to Article 15 of the Wildlife (Northern Ireland) Order 1985 (as amended) under which it is an offence for any person to plant or otherwise cause to grow in the wild any plant which is included in Part II of Schedule 9 of the Order, which includes New Zealand Pigmyweed *Crassula helmsii*. This highly invasive plant species has been recorded on site and control measures must be taken to ensure that any works do not cause it to spread either on or off the site. Any soil containing New Zealand Pigmyweed plant or seed material which is removed off site is classified as controlled waste under the Controlled Waste Regulations (Northern Ireland) 2002 (as amended). The Controlled Waste (Duty of Care) Regulations (Northern Ireland) 2002 (as amended) places a duty of care on 'anyone who produces, imports, stores, transports, treats, recycles or disposes of waste to take the necessary steps to keep it safe and to prevent it from causing harm, especially to the environment or to human health'. In the case of New Zealand Pigmyweed, it is the duty of the waste producer to inform the licensed waste carrier and licensed landfill site that the controlled waste material contains New Zealand Pigmyweed as part of the waste transfer process. Please see the

following link for Best Practice Guidance:

<http://invasivespeciesireland.com/toolkit/best-practice-management/>

Further advice can be sought from the Wildlife Team, Northern Ireland Environment Agency, Klondyke Building, Cromac Avenue, Belfast BT7 2JA. Tel: 028 905 69605

# Site Location

