



Implementation Date: 01 September 2023

Template for Requesting Speaking Rights at the Planning Committee

The Protocol for the Operation of the Planning Committee provides for interested person(s) to register to speak on a planning application that is scheduled to be determined at the next meeting of the Planning Committee. This request must be received by the Planning Department no later than 10am on the Monday before the Planning Committee meeting via email account planning@causewaycoastandglens.gov.uk.

Planning Reference	LA01/2024/0058/F
Name	Alan Irwin
Contact Details	Tel: Email:
Support or Objection – please tick relevant box	Support <input checked="" type="checkbox"/> Objection <input type="checkbox"/>

Written representation summarising key points to be addressed and supplementary information in support of your case (minimum font size 10 and maximum length two sides of A4 page).

Refusal Reason 1 - The proposal is contrary to Policy COU4 of the Northern Area Plan 2016 (NAP), Paragraph 6.6 of the Strategic Planning Policy Statement for Northern Ireland (SPPS) and Policy BH5 of PPS6 in that the site lies within the Distinctive Landscape Setting of the Giant’s Causeway and Causeway Coast World Heritage Site (WHS). The proposed barn conversion with extension and roof alterations does not qualify as an exception and therefore does not justify a relaxation of the strict planning controls in this area.

Rebuttal

Policy Cou 4 of the NAP allows three forms of development within the Distinctive Landscape Setting of the WHS (described at para.8.5 of the Executive Summary). Two of these forms of development are relevant to the proposal:-

1. *exceptionally modest scale facilities, without landscape detriment, which are necessary to meet the direct needs of visitors to the World Heritage Site;*
2. *extensions to buildings that are appropriate in scale and design and represent not more than 20% of the cubic content of existing buildings.*

These allowances will be permitted only once.

The application proposes an exceptionally modest expansion of facilities to meet increasing demand at an established guesthouse where visitors to the WHS are accommodated within 5-10 minutes’ walk from the WHS visitor centre.

Paragraph 8.7 of the Executive Summary confirms the proposed extension is subordinate in scale to the original building and will not increase the cubic content by more than 20%. Paragraphs 8.16 to 8.23 of the Executive Summary confirm the small scale of the development and the detail of the proposal "*will not unacceptably harm the character of the AONB*".

The amplification of COU4 within the NAP states:- "*The Department considers some visitor related development is acceptable in this area. However, it should be small in scale, both in terms of built form and be directly related to the WHS and require a location in proximity to it, rather than a facility to meet the needs of visitors to the general area.*"

We contend the proposal is acceptable in scale and detail, it will not harm the character of the area or the WHS and policy COU4 makes provision for this sort of small scale development in close proximity to the WHS.

Paragraph 6.6 of the SPPS seeks to preserve the Outstanding Universal Value of a WHS and the integrity of its setting. Planning authorities are charged to take into account the safeguarding of critical views to and from the site, the access and public approaches to the site.

The Executive Summary confirms the proposal will not harm the character and appearance of the locality, the proposed finishes are satisfactory, the proposal will not harm rural character and it will not harm the character of the AONB.

Policy BH5 of PPS6 states that development which would adversely affect a WHS or its setting will not be permitted. The policy acknowledges development proposals affecting such sites may be compatible with this objective but particular attention must be paid to:-

- the critical views of, and from the site;
- the access and public approaches to the site; and
- the understanding and enjoyment of the site by visitors.

As outlined above the Executive Summary confirms the proposal will not harm the rural character or the character of the AONB. Public views of the proposal are from Causeway Road but are described as long range. The proposal is therefore compatible with the provisions of PPS6 BH5.

Refusal Reason 2 - The proposal is contrary to Paragraph 6.73 of the SPPS 9 (The conversion and re-use of existing buildings for residential use), because the existing building for conversion is not considered to be a locally important building.

Rebuttal

The initial site visit carried out by the case officer on 22.2.24 led to an incorrect assessment of the building as a contemporary garage. This was corrected as indicated at paragraph 8.13 of the Executive Summary.

We contend the initial opinion formed by the case officer has had a detrimental impact on the outcome of this application process.

Carnside has been owned by the Lynch family since 1954 and has operated as a guest house since that time. Accommodation is principally provided for visitors to the WHS. The subject building has been a feature of OSNI mapping since the first edition of 1832. A travel log titled "*An Irish Patriach*" records a visit to the site in the autumn of 1869. Buildings are described as "*roughly built of fragments of basaltic rock and roofed with grass-grown thatch.*" This form of construction is clearly visible in the existing building.

Paragraph 6.73 of the SPPS allows the conversion of a range of buildings including traditional barns and outbuildings. It has been accepted that the building is of stone construction and therefore capable of conversion.

Paragraph 6.73 also requires a building to be locally important.

We contend this building, while small in scale, is locally important as a remnant of an historic pattern of development associated with this location. The building is too small for contemporary agricultural use and sympathetic conversion will safeguard the building's future.