



Title of Report:	Planning Committee Report – LA01/2024/0703/O
Committee Report Submitted To:	Planning Committee
Date of Meeting:	25 <sup>th</sup> March 2026
For Decision or For Information	For Decision – Referred Application by Cllr Leanne Peacock
To be discussed In Committee YES/NO	

#### **Linkage to Council Strategy (2021-25)**

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

#### **Estimated Timescale for Completion**

Date to be Completed	
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#### **Budgetary Considerations**

Cost of Proposal	Nil
Included in Current Year Estimates	N/A
Capital/Revenue	N/A
Code	N/A
Staffing Costs	N/A

<b>Screening Requirements</b>	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals.		
Section 75 Screening	Screening Completed:	N/A	Date:
	EQIA Required and Completed:	N/A	Date:
Rural Needs Assessment (RNA)	Screening Completed	N/A	Date:
	RNA Required and Completed:	N/A	Date:
Data Protection Impact Assessment (DPIA)	Screening Completed:	N/A	Date:
	DPIA Required and Completed:	N/A	Date:

**No:** LA01/2024/0703/O      **Ward:** Dunloy

**App Type:** Outline

**Address:** 56m South East of 223 Garryduff Road, Dunloy.

**Proposal:** Proposed site for a single storey dwelling with detached garage parking and access to Garryduff Road. Also the formation of a field access in conjunction with the site access.

**Con Area:** N/A      **Valid Date:** 17/06/2024

**Listed Building Grade:** N/A

**Agent:** Ivan McDonald. 15 Cloonavin Park, Coleraine. BT52 1RU

**Applicant:** Phyllis Calderwood. 223 Garryduff Road, Dunloy. BT44 9EE

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

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

## Executive Summary

- Outline planning permission is being sought for an infill site to construct a dwelling and garage.
- The site is located within the countryside being outside any defined settlement development limits and is not subject to any notable designations or zoning.
- Consultation was undertaken with DFI Roads, NI Water, NIEA, and Environmental Health Department in relation to the proposal with no objections being raised.
- The principal of development is considered unacceptable in terms of paragraph 6.73 of the SPPS 2<sup>nd</sup> Edition and Policy CTY 8 of PPS 21 in that the proposal does not represent a small gap site within a substantial and continuously built-up frontage at this location and would result in the addition to ribbon development.
- The application fails to comply with paragraph 6.70 of the SPPS and Policy CTY 13 of PPS 21 in that the proposal does not integrate with the surrounding landscape resulting in a prominent feature being created in the landscape.
- The proposal also fails paragraphs 6.70 of the SPPS and Policy CTY 14 of PPS 2 in that the proposal would, add to an existing ribbon of development along Garryduff Road, fail to respect the existing pattern of development and would be unduly prominent in the landscape, resulting in a detrimental change to the rural character of the area.
- No letters of support and no letters of objection have been received in relation to this application.
- This application is recommended for Refusal.

Drawings and additional information are available to view on the Planning Portal:

<https://planningregister.planningssystemni.gov.uk/simple-search>

## 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** outline planning permission subject to the reasons set out in section 10.

## 2 SITE LOCATION & DESCRIPTION

- 2.1 The application site as delineated by the red line extends to approximately 0.5 hectares and comprises a roadside portion of a large agricultural field. The eastern roadside boundary is defined by a 2m well-established hedge with an agricultural access situated to the southern corner and a further entrance point located towards the northern corner. The northern boundary is defined for approximately half its length by a recently constructed post and wire fence with the remainder defined by hedge and tree planting. Both the western and southern boundaries are undefined and open to the surrounding agricultural land. The topography of the plot and immediate surrounding area rises steadily in ground level from east to west.
- 2.2 The site is located on the western side of Garryduff Road, in proximity to its junction with Galdanagh Road, and approximately 1.1 km north-west of Dunloy village. The surrounding area is rural in character, comprising of single residential dwellings, farm holdings, and agricultural land.
- 2.3 As indicated by Map No 2 of the Northern Area Plan (NAP) the site is located outside any defined development limits and is therefore designated as being within the countryside.

## 3 RELEVANT HISTORY

- 3.1 LA01/2024/0702/O – 115m south-east of 223 Garryduff Road, Dunloy. Proposed site for a single storey dwelling with detached garage parking and access to Garryduff Road. Also, the formation of a field access in conjunction with the site access. Current Application.

## **4 THE APPLICATION**

- 4.1 This application seeks outline planning permission for an infill site to construct a dwelling and garage.

## **5 PUBLICITY & CONSULTATIONS**

### **5.1 External**

Advertising: The application was advertised on 3rd July 2024.

Neighbours: Neighbours were notified on 10th July 2024.

No letters of support or objection were received in relation to this application.

### **5.2 Internal**

DFI Roads: No objections.

NI Water: No objections.

Environmental Health: No objections.

NIEA WMU: No objections.

## **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 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:

- The Northern Area Plan 2016 (NAP)

- 6.3 The Regional Development Strategy (RDS) is a material consideration.

- 6.4 The Strategic Planning Policy Statement for Northern Ireland (SPPS) Edition 2, 2025 is a material consideration. As set out in the SPPS 2<sup>nd</sup>

edition, 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**

[The Northern Area Plan 2016](#)

[The Strategic Planning Policy Statement \(SPPS\) Edition 2 \(2025\)](#)

[Planning Policy Statement 3 \(PPS 3\) – Access, Movement and Parking](#)

[Planning Policy Statement 21 – Sustainable Development in the Countryside](#)

[Building on Tradition: A Sustainable Design Guide for the Northern Ireland Countryside](#)

## **8 CONSIDERATIONS & ASSESSMENT**

- 8.1 The main considerations in the determination of this application relate to the principle of development, integration and rural character, access and Habitats Regulations Assessment.

### **Principle of development**

- 8.2 The proposal must be considered having regard to the NAP 2016, SPPS 2<sup>nd</sup> edition, and PPS policy documents specified above.
- 8.3 Paragraph 6.73 of the SPPS and Planning Policy Statement 21 - Sustainable development in the Countryside, Policy CTY 1 notes that there are a range of types of development which in principle are considered to be acceptable in the countryside and that will contribute to the aims of sustainable development. One such scenario is the

development of a small gap site within an otherwise substantial and continuously built-up frontage in accordance with Policy CTY 8.

- 8.4 Paragraph 6.73 of the SPPS and Policy CTY 8 of PPS 21 state that planning permission will be refused where a proposal creates or adds to ribbon development. An exception may be permitted for a small gap site capable of accommodating no more than two dwellings within an otherwise substantial and continuously built-up frontage, where the proposal respects the established pattern of development in terms of size, scale, siting and plot dimensions and meets all other planning and environmental requirements. For policy purposes, a substantial and built-up frontage is defined as a line of three or more buildings along a road frontage with no back-land development.
- 8.5 The site comprises approximately half of the uninterrupted roadside frontage of a larger agricultural field and is situated adjacent to an existing detached dwelling, no. 223 Garryduff Road. The remaining roadside section of the host field adjoins the southern side and is the subject of a similar infill proposal under LA01/2024/0702/O followed by four semi-detached roadside dwellings addressed as 231, 233, 235 and 237 Garryduff Road.
- 8.6 Two dwellings at no. 217 Garryduff Road and no. 74 Galdanagh Road, along with an approved site, lie to the north of no. 223. However, this frontage is less clearly defined as no. 223 sits well back from the road and its access lane is the only element adjoining Garryduff Road. Consequently, No. 223 cannot be regarded as having an established roadside frontage. Although a small paddock has more recently been created to the front of the property by the erection of a new post and wire fence this does not form part of the residential curtilage of No. 223. The adjacent approved site under LA01/2022/1195/O also cannot contribute to a continuous built-up frontage as it remains undeveloped.
- 8.7 Notwithstanding this, the gap between buildings must be small enough to accommodate a maximum of two dwellings while respecting the established pattern of development and read as part of an existing, continuous built-up frontage. The site itself scales approximately 70 metres in overall width with a separate agricultural access being proposed along the southern boundary to allow access to the land at the rear. To the north, no. 217 features a plot width of 29m while no. 74 Galdanagh Road has a frontage of 25.2m, while to the south the existing dwellings no's. 237 to 231 have plot widths of 18.1m, 17.9m,

22m and 22.6m respectively, resulting in an overall average of 22.4 metres.

- 8.8 The proposed site therefore significantly exceeds the typical plot widths that define the existing development pattern and is approximately two and a half times wider than the average plot width within the frontage. The proposal is also heavily reliant on the associated site to the north (LA01/2024/0702/O) being acceptable under Policy CTY 8, resulting in a combined roadside frontage of approximately 122 metres. However, given the scale of the frontage involved and the need for both sites to work collectively to achieve a perceived gap, the arrangement does not fulfil the policy requirement for a small gap only capable of accommodating one or two dwellings within a substantial and continuously built-up frontage.
- 8.9 Paragraph 5.34 of PPS 21 confirms that the gap must be assessed from building to building. The gap in this case is defined by the established roadside frontage buildings at nos. 217 and 231 Garryduff Road, which are separated by approximately 222 metres. Based on the prevailing average plot width along this section of the road, up to ten dwellings could theoretically be accommodated within this gap. Even if the approved but undeveloped site (31m) was considered as part of the built-up frontage, the overall gap would still be in excess of 180m and capable of accommodating 8 dwellings and could not reasonably be regarded as small, nor does the application site reflect the established pattern of development in terms of scale or plot size. As such, the proposal fails to meet paragraph 6.73 of the SPPS and Policy CTY 8 in that the proposal does not represent a small gap site within a substantial and continuously built-up frontage and fails to respect the existing development pattern along the frontage.
- 8.10 This application is directly comparable to Planning Application LA01/2023/0692/O (Haw Rd, Bushmills) which, was refused planning permission by the Council and subsequently dismissed on appeal (2025/A0044 - Appendix 1), due to the gap being able to accommodate more than two dwellings when respecting the average plot size, and the proposal not respecting the established pattern of development along the established frontage.
- 8.11 Furthermore, at this scale, the separation is large enough for the land to read as a vital visual break as part of the wider open countryside rather than as a definable gap between established buildings. The roadside strip of undeveloped land between nos. 217 and 231 extends

for over 200 metres. This substantial area of agricultural land provides an important break in the built form and contributes to the openness and rural character of this stretch of Garryduff Road. It is this type of visual and spatial relief that Policy CTY 8 seeks to retain, ensuring that new development does not erode the established pattern of dispersed frontage or create an extended run of roadside buildings.

- 8.12 The infilling of the gap between the dwelling at no. 217 and the dwelling at no. 231 Garryduff Road would remove an important visual break that provides relief within the roadside streetscape and contributes to the rural character of the area. Its loss would extend development along this stretch of Garryduff Road and result in the addition to ribbon development, further eroding the rural character. Therefore, the proposal fails Paragraph 6.70 of the SPPS and Policy CTY 8 of PPS 21.
- 8.13 Additionally, as there are no overriding reasons why the development is essential and could not be located in a settlement and the application fails paragraph 6.73 of the SPPS and Policy CTY 1 of PPS 21.

### **Integration and rural character**

- 8.14 Policy CTY 13 of PPS 21 states that planning permission will be granted for a building in the countryside where all criteria is met and where it can be visually integrated into the surrounding landscape and is of an appropriate design. In addition, this Policy covers ancillary works associated with the property which must also integrate with their surroundings
- 8.15 As this is an outline application, no detailed design information has been submitted in relation to the proposed dwelling, garage and ancillary works, however aside from the mature roadside hedge, the site lacks long established natural boundaries and would be reliant on new landscaping to provide enclosure and integration. Given the local topography, a new dwelling following the existing two-storey pattern of development would likely appear prominent and visually intrusive within the landscape. Development of the site would extend and consolidate the existing ribbon of roadside buildings at this location. In the absence of mature features capable of integrating a new dwelling into the landscape, the proposal fails to demonstrate that it would achieve satisfactory integration. Accordingly, it is contrary to Paragraph 6.70 of the SPPS and Policy CTY 13 of PPS 21.

- 8.16 Policy CTY 14 of PPS 21 sets out that Planning permission will be granted for a building in the countryside where it complies with all criteria and does not cause a detrimental change to, or further erode the rural character of an area. This Policy also relates to the impact of ancillary works (except for necessary visibility splays) which again should not damage rural character.
- 8.17 As outlined above at paragraphs 8.3 - 8.12, the proposal does not constitute the infilling of a small gap. The application site is substantially larger in frontage width and overall site area than the surrounding plots that define the existing built-up frontage. As a result, it fails to respect the traditional pattern of development in this locality. Accordingly, the proposal is contrary to criterion (c) of Policy CTY 14.
- 8.18 As outlined above at paragraph 8.11 the infilling of the gap between the dwelling at no. 217 and the dwelling at no. 231 Garryduff Road would remove an important visual break within the streetscape, extending development along this stretch of Garryduff Road and result in the addition to ribbon development. Therefore, the proposal fails Paragraph 6.70 of the SPPS and Policy CTY 14 of PPS 21.

### **Access**

- 8.19 Policy AMP 2 of PPS3 sets out that planning permission will only be granted for a development proposal involving direct access, or the intensification of the use of an existing access, onto a public road where road safety will not be prejudiced or the flow of traffic significantly inconvenienced and where the proposal does not conflict with Policy AMP 3 Access to Protected Routes.
- 8.20 The proposed access would adjoin the existing agricultural entrance serving the field, although the precise access arrangements have not been finalised as this is an outline application. DfI Roads was consulted and has no objection in principle, subject to condition. The proposal complies with Policy AMP 2 of PPS3.

### **Habitats Regulation Assessment**

- 8.21 The potential impact this proposal on Special Areas of Conservation, Special Protection Areas 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, conservation objectives or status of any of these sites.

## **9 CONCLUSION**

- 9.1 The proposal fails to comply with the relevant planning policies. The application site forms part of a gap that is capable of accommodating considerably more than two dwellings of a size comparable to the surrounding pattern of development and therefore does not constitute a “small gap site” within a substantial and continuously built-up frontage. The development would fail to respect the established pattern of development and would contribute to ribbon development along Garryduff Road. The site lacks sufficient existing enclosure to enable satisfactory integration. The proposal does not fall within any of the permissible forms of development in the countryside, and no overriding reasons have been advanced to justify a dwelling at this location. The application is contrary to Paragraphs 6.70 and 6.73 of the SPPS 2<sup>nd</sup> edition and Policies CTY 1, CTY 8, CTY 13 and CTY 14 of PPS 21. Refusal is recommended.

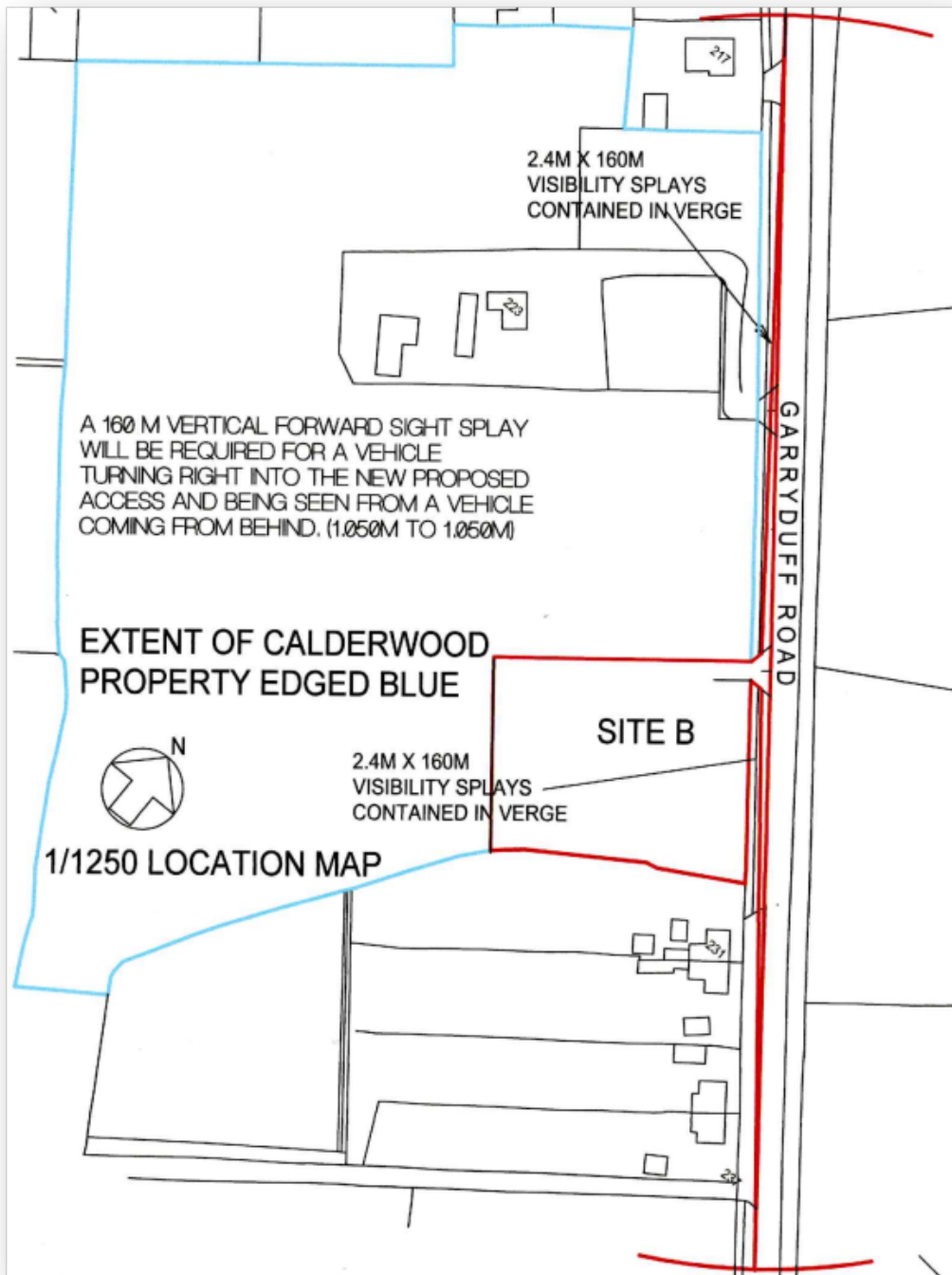
## **10 Reasons for Refusal**

1. The proposal is contrary to paragraph 6.73 of the SPPS and Policy CTY 1 of PPS 21: Sustainable Development in the Countryside in that there are no overriding reasons why the development is essential in this location and could not be located within a settlement.
2. The proposal is contrary to paragraph 6.73 of the SPPS and Policy CTY 8 of PPS 21: Sustainable Development in the Countryside in that the proposal does not represent a small gap site within a substantial and continuously built-up frontage at this location, the proposal would, if permitted, result in the addition to ribbon development along Garryduff Road and would fail to respect the existing pattern of development along the frontage.
3. The proposal is contrary to paragraph 6.70 of the SPPS and Policy CTY 13 of PPS 21: Sustainable Development in the Countryside in

that the site is unable to provide a suitable degree of enclosure for the building to integrate into the landscape; it relies primarily on the use of new landscaping for integration and would be a prominent feature in the landscape.

4. The proposal is contrary to paragraph 6.70 of the SPPS and Policy CTY 14 of PPS 21: Sustainable Development in the Countryside in that the proposal would, if permitted, appear unduly prominent in the landscape; does not respect the traditional pattern of settlement exhibited in the area; and would add to ribbon of development along Garryduff Road.

# Site location Map



## Referral Request

A chara,

I request that the below application is referred to the planning committee for decision for the planning reasons outlined.

Le meas,

Leanne

LA01/2024/0702/O

1. The proposal is contrary to paragraphs 6.73 of the SPPS and Policy CTY 1 of PPS 21: Sustainable Development in the Countryside in that there are no overriding reasons why the development is essential in this location and could not be located within a settlement.

See notes below

2. The proposal is contrary to paragraphs 6.73 of the SPPS and Policy CTY 8 of PPS 21: Sustainable Development in the Countryside in that there is no substantial and continuously built-up frontage at this location and the proposal would, if permitted, result in the creation of ribbon development along Garryduff Road.

It is contended that there is a substantial and continuously built-up frontage at the location. This is formed by No 223 and 231 to 237 Garryduff Road. For No 223 there was an undefined boundary, shown in red on the Location Map. The area between the red line and the driveway to No 223 was part of the garden of the dwelling. Due to advancing age the maintenance of the front garden became too much for the owners and it was left to be cut along with the field beside. A fence has since been re-erected in this position. To reinforce this, it can be seen that maintenance of the grass verge to Garryduff Road, as an extension of the undefined boundary, has been carried out at the behest of the owners over the years, not by general Highway Maintenance. Between No 223 and No 217 Garryduff Road there is a recently approved site for a dwelling (LA01/2022/1195/O) with its access coupled with, and running across, the frontage of No 223.

3. The proposal is contrary to paragraphs 6.70 and 6.73 of the SPPS and Policy CTY 13 of PPS 21: Sustainable Development in the Countryside in that the proposal does not integrate with the surrounding landscape, fails to blend with the landform, resulting in a prominent feature being created in the landscape. The frontage with Garryduff Road is formed by a tall, mature hedge line. This would be maintained and reinforced with new planting of a similar variety. The proposal would be for a single storey dwelling set on the lower portion of the lands closer to the main road than No 223. This would

2. allow the dwelling to blend with the landform, benefitting from the existing established backdrop of the rising field level and mature vegetation to the west. This is noted in the DMO Report connected with LA01/2022/1195/O. "The topography of the site and surrounding area rises from the southeast towards the northwest, and beyond the site which will act as a backdrop for a modest dwelling" and "the existing vegetation will be conditioned to be retained".

## Appendix 1 – Appeal 2025/A0044



# Appeal Decision

Planning Appeals Commission  
4<sup>th</sup> Floor  
92 Ann Street  
Belfast  
BT1 3HH  
T: 028 9024 4710  
E: [info@pacni.gov.uk](mailto:info@pacni.gov.uk)

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<b>Appeal Reference:</b>	2025/A0044.
<b>Appeal by:</b>	Mr. Trevor Knox.
<b>Appeal against:</b>	The refusal of full planning permission.
<b>Proposed Development:</b>	Proposed Infill Dwellings and Garages.
<b>Location:</b>	Between 88 & 90 Haw Road, Bushmills.
<b>Planning Authority:</b>	Causeway Coast & Glens Borough Council.
<b>Application Reference:</b>	LA01/2023/0692/O.
<b>Procedure:</b>	Written Representations with Commissioner's site visit on 16 <sup>th</sup> October 2025.
<b>Decision by:</b>	Commissioner Kieran O'Connell, 24 <sup>th</sup> October 2024.

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### Decision

1. The appeal is dismissed.

### Reasons

2. The main issues in this appeal are whether the appeal proposal is acceptable in principle in the countryside and its effect on rural character.
3. Section 45(1) of the Planning (Northern Ireland) Act 2011 states that regard must be had to the Local Development Plan (LDP), so far as material to the application and to any other material considerations. Section 6(4) of the Act requires that, where in making any determination under the Act, regard is to be had to the LDP, the determination must be made in accordance with the plan unless material considerations indicate otherwise.
4. The Northern Area Plan 2016 (NAP) operates as the LDP for the area within which the appeal sites are located. In it, the appeal site lies within the countryside. The NAP has no plans or policies that are relevant to the appeal proposal but rather directs to regional policy.
5. The Strategic Planning Policy Statement for Northern Ireland 'Planning for Sustainable Development' (SPPS) sets out transitional arrangements that will operate until a Plan Strategy (PS) is adopted for a Council area. In this case, there is no PS. Accordingly, during the transitional period, the SPPS retains certain existing Planning Policy Statements (PPSs), including Planning Policy Statement 21: Sustainable Development in the Countryside (PPS21). As there is no conflict or change in policy direction between the provisions of the SPPS and retained policy, PPS21 provides the relevant policy context for assessing the appeal development.

2025/A0044

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6. Policy CTY1 of PPS 21 is titled 'Development in the Countryside'. It states that there are a range of types of development which are considered to be acceptable in principle in the countryside and that will contribute to the aims of sustainable development. One of these is for the development of a small gap site within an otherwise substantial and continuously built-up frontage in accordance with Policy CTY 8. Additional guidance is provided in Building on Tradition: A Sustainable Design Guide for The Northern Ireland Countryside (BOT).
7. Policy CTY8 of PPS 21 is titled 'Ribbon Development'. It states that planning permission will be refused for a building which creates or adds to a ribbon of development. It continues to say that an exception will be permitted for the development of a small gap site sufficient only to accommodate up to a maximum of two houses within an otherwise substantial and continuously built-up frontage and provided this respects the existing development pattern along the frontage in terms of size, scale, siting, and plot size and meets other planning and environmental requirements. For the purpose of this policy, the definition of a substantial and continuously built-up frontage includes a line of three or more buildings along a road frontage without accompanying development to the rear.
8. The first step in determining whether the proposal constitutes an exception in accordance with Policy CTY8 is to determine whether there is a substantial and continuously built-up frontage. There is no dispute that a substantial and continuously built-up frontage exists along this section of Haw Road. This comprises of the church hall to the north of the appeal site and the semi-detached dwellings at No.90, 90a, 92, 94 and the detached dwelling at No.96. This is the case irrespective of whether the dwelling at No.98 and the adjacent agricultural outbuildings form part of the substantial and continuously built up frontage due to agricultural laneway and a group of trees immediately south of No.96.
9. The second element of the infill policy is that there is a small gap site, sufficient only to accommodate up to a maximum of two houses. In accordance with Paragraph 5.34 of the justification and amplification to the policy, it is the gap between buildings rather than the appeal site that should be considered. There is no dispute that the gap to be considered is between the dwelling at No.90 to the south of the appeal site and the Church Hall to the north. The parties consider the gap to be around 83.5m-87.5m.
10. To be suitable for infilling under the policy, a gap site must not only be physically sufficient to accommodate no more than one or two houses but must also be able to do so in a manner that respects the existing development pattern and meets other planning and environmental requirements. Whether or not a gap site is suitable for infill development is not merely a mathematical exercise but rather a matter of planning judgement, taking into account what one ascertains on the ground and balancing all the evidence against the policy requirements.
11. The proposed concept plan depicts two detached dwellings with detached garages with frontage onto Haw Road located within a larger agricultural field. It is agreed that the overall field frontage in which the appeal site sits measures approximately 78.8 meters. Furthermore, there is no dispute that each of the proposed sites would have a frontage of around 32.6 meters, with the remaining 13m frontage left to gain access to agricultural land to the rear of the proposed development.

12. The Council asserts that the average frontage width, excluding No.98 and its outbuildings, is approximately 14m. However, if No.98's frontage is included, there is no dispute that the average frontage width along Haw Road would be around 23m. In the evidential context provided and from my on-site observations, the gap of 83.5-87.5m exceeds twice the average plot width of 23m. As such, irrespective of whether the Appellant has applied for two dwellings, this gap could accommodate more than two dwellings. Furthermore, the gap could accommodate several dwellings based on the 14m average width cited by the Council if the frontage width of No.98 were discounted. In both instances, as the gap as a whole could accommodate more than two dwellings, it does not qualify as being 'small'. Consequently, the appeal proposal fails to meet the exceptional test of Policy CTY8. The Appellant's analysis, including the indicative site plan fails to persuade otherwise
13. Notwithstanding my conclusions above, the Council also raised an objection under Policy CTY14 of PPS 21, which relates to rural character. This policy is cross-referenced with Policy CTY8 of PPS21. Policy CTY14 states that planning permission will be granted for a building in the countryside where it does not cause a detrimental change to or further erode the rural character of an area. The Council raised concern that the appeal development would be contrary to criterion (c) and (d) of Policy CTY14 in that the proposal does not respect the traditional pattern of settlement exhibited in the area and would add to a ribbon of development along Haw Road which would have an adverse impact on the rural character of the area similar to its concerns under Policy CTY8.
14. The Appellant contends that the plot size for the proposed dwellings, each approximately 0.09ha, would align with the existing development pattern by consolidating ribbon development along Haw Road. While the Council acknowledges the comparable site area, its concerns focus on the overall form of the proposed sites rather than the plot size.
15. The Appellant acknowledges the elongated nature of some properties along the road frontage but argues that this characteristic is 'ill-material' [sic] to the area's overall suburban built-up character. Policy CTY8 is clear that various factors, such as size, scale, siting, and plot dimensions, must be considered in assessing the existing development pattern. The Appellant argues that the proposed sites, with depths of 28.5m and frontage widths of 32.6m, are normally sized and appropriate for dwellings in the countryside and would be comparable to that of the Church Hall. However, in my judgement, the existing plots comprising No.90-96 establish the predominant development pattern along this part of Haw Road. These exhibit long and narrow plots. In contrast, the proposed plots would have a depth approximately half that of those at No.90-96 and a 32.6m frontage width that does not align with the average narrow frontages of 14m for the aforementioned dwellings within the ribbon. Consequently, whilst I accept it is not necessary for the frontage and plot sizes to be identical, the appeal proposal does not adequately respect the established development pattern along the identified road frontage.
16. In addition, the Council considered that the appeal site provides visual relief in the developed appearance of the area and that two dwellings on the appeal site would add to ribbon development along Haw Road. Paragraph 5.80 of PPS21 recognises that ribbon development is always detrimental to the rural character of an area as it contributes to a localised sense of build-up and fails to respect the traditional

settlement pattern of the countryside. Although PPS21 does not provide a comprehensive definition of ribbon development, paragraph 5.33 indicates that it does not necessarily have to be served by individual accesses nor have a continuous or uniform building line. Buildings sited back, staggered or at angles and with gaps between them can still represent ribbon development if they have a common frontage or they are visually linked.

17. No.98, its associated outbuildings and Nos 96, 94, 92, 90a and 90 to the south of the appeal site all have frontage to the road. They are also intervisible in both directions travelling along Haw Road and comprise an existing ribbon of development. The addition of two dwellings on the appeal site, would visually link with and share common frontage with the aforementioned ribbon along Haw Road. This would extend development northward towards the Church Hall adding to the existing ribbon of development to the detriment of rural character irrespective of either sites design and integration merits. The existing gap between the church hall and the dwellings to the south of the appeal site, therefore, serves as an important visual break which maintains the rural character of Haw Road by preventing the coalescence of development.
18. Although the Council argued the appeal development would be similar to two appeal decisions within its jurisdiction, direct comparisons are rare as each case falls to be assessed on its own site-specific merits and within its own evidential context. In any event, given the large size of the gap site, the failure to respect the development pattern and as the proposal would add to ribbon development, neither Policy CTY8 nor CTY14 are met when read as a whole. Accordingly, the Council has sustained its second and third reasons for refusal based upon Policies CTY8 and CTY14 and the related provisions of the SPPS.
19. In light of my findings above, the proposal does not represent one of the types of development that are considered to be acceptable in principle in the countryside, and no overriding reasons were presented to demonstrate how the appeal development is essential and could not be located in a settlement. It is, therefore, also contrary to Policy CTY 1 of PPS21. The Council's first reason for refusal is sustained. The appeal must fail.

This decision is based on the following drawings refused by the Council on 3<sup>rd</sup> July 2025:

- 01 – 1:2500 scale, titled 'Proposed Location Plan', dated by the Appellant June 2023.
- 02 Rev 01 – 1:500 scale, Proposed Concept Plan, dated by the Appellant June 2023

**COMMISSIONER KIERAN O'CONNELL**

**List of Documents**

- Council: -           Statement of Case by Causeway Coast and Glens Borough Council.
- Rebuttal Statement by Causeway Coast and Glens Borough Council.
- Appellant: -         Statement of Case by Lee Kennedy Planning.
- Rebuttal Statement by Lee Kennedy Planning.

# Erratum

## LA01/2024/0703/O

### 1.0 Update

- 1.1 The Site location plan contained within the Planning Committee Report is incorrect as it relates to the adjacent site LA01/2024/0702/O (Site B). The location plan should be replaced with the following Site Location Plan

