

Title of Report:	TPO Confirmation – Lands adjacent to Kilrea Golf Club, 47A Lisnagrot Road, Kilrea (LA01/2026/0024/TPO)
Committee Report Submitted To:	PLANNING COMMITTEE
Date of Meeting:	26th August 2026
For Decision or For Information	For Decision

Linkage to Council Plan (2026-2031)	
Strategic Priority No.1	Engaging and Communicating with Our Customers
Outcome	Ensure citizens have genuine opportunities to influence Council policies, strategies, and service delivery decisions
Strategic Priority No.4	Sustainability and Managing Our Natural and Built Environment
Outcome	A Borough that contributes effectively to Northern Ireland's climate change targets with reducing carbon emissions and increasing resilience to climate impacts
Lead Officer	Principal Planning Officer

Budgetary Considerations:	
Cost of Proposal	TPO Survey £1850 (excl.VAT)
Included in Current Year Estimates	Within Budget
Capital/Revenue	
Code	34000 5301
Staffing Costs	Within budget/working hours

Screening Requirements	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals. Not applicable in this case.		
Section 75 Screening	Screening Completed:	Yes/No	Date:
	EQIA Required and Completed:	Yes/No	Date:
Rural Needs Assessment (RNA)	Screening Completed	Yes/No	Date:
	RNA Required and Completed:	Yes/No	Date:
Data Protection Impact	Screening Completed:	Yes/No	Date:

Assessment (DPIA)	DPIA Required and Completed:	Yes/No	Date:
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1.0 Purpose of Report

- 1.1 To present the TPO confirmation, with modification, for Lands adjacent to Kilrea Golf Club, 47a Lisnagrot Road, Kilrea.

2.0 Background

- 2.1 Under Sections 122 and 123 of the Planning Act (NI) 2011 and the provisions of the Planning (Trees) Regulations (Northern Ireland) 2015 the Council may make Tree Preservation Orders (TPOs) to afford statutory protection to selected trees or woodlands if their removal is likely to have a significant impact on the local environment and its enjoyment by the public.
- 2.2 Trees can have a high amenity value and can make an important contribution to the environment, creating a varied, interesting and attractive landscape. They can help define the character of an area and create a sense of place acting as landmark features in urban and rural areas. They also have nature conservation, historic and recreational value. Trees in the Northern Ireland landscape are limited, therefore, where they do exist their contribution is valued.
- 2.3 The Council may make a TPO for the purpose of protecting trees if they are considered to be of special value in terms of amenity, history or rarity, which may or may not be under threat. Therefore, to be considered for a TPO, trees must be of high amenity value and in reasonable condition. The following criteria are used when assessing the merits of a potential TPO:
- **Potential Threat:** Priority will be given to the protection of those trees deemed to be at immediate risk from active felling or damage from development on site. All other requests will be assessed and prioritised accordingly.
 - **Visibility:** The extent to which the trees or woodlands can be seen by the general public will inform the assessment of whether the impact on the local environment is significant.
 - **Individual Impact:** The mere fact that a tree is publicly visible will not itself be sufficient to warrant a TPO. The tree's particular importance will be assessed by reference to its size and form. Its future potential as an amenity should also be assessed, taking into account any special factors such as its screening value or contribution to the character or appearance of an area. In relation to a group of trees or woodland, an assessment will be made of the collective impact.
 - **Wider Impact:** The significance of the trees in their local surroundings will also be assessed, taking into account how suitable they are to their particular setting, as well as the presence of other trees in the vicinity.
 - **Historical Importance:** Certain trees, because of their age, association with the setting of listed buildings, or the contribution they make to the special

character of a conservation area, may require consideration for TPO protection.

- **Rarity:** There may be occasions where a tree(s) may be considered for TPO protection solely on the grounds of its rarity. The priority of the consideration will reflect the rarity of the species.
- 2.4 All types of tree can be protected. The Order can cover anything from a single tree to woodlands. Normally, unless a Woodland TPO is proposed, only trees over 3.5m in height are considered for a TPO. Hedges, bushes and shrubs will not be protected.
- 2.5 In terms of the process and timescales, a Provisional TPO is normally served first, with the final confirmation within six months, or it can be allowed to lapse if it is considered, as a result of detailed assessment, that the trees are not considered worthy of protection.

3.0 Site Context

- 3.1 The site is located on lands adjacent to Kilrea Golf Club, 47a Lisnagrot Road, Kilrea. Presently, the site does not form part of the holes of the golf course. The site is located outside the settlement development limits of Kilrea, within the Designated SLNCI CNC 41 – The Rough Hills. Located within the site is a woodland which provides a backdrop to Kilrea Golf Club. Historical maps show that portions of this woodland have existed on the site since 1838 – 1862.
- 3.2 There are currently no planning applications associated with this site. However, the request for a TPO at this site referred to ‘exploratory activities (by Kilrea Golf Club) to create an additional golf hole’. As a portion of the site contains an area of woodland shown on the historic maps from the mid-1800s, it is reasonable to assume the trees in this area, are historically significant. In regard to visual amenity, the trees provide a backdrop to the Kilrea Golf Club and enhance the experience for those using the golf course’s facilities. Additionally, the woodland is partially on elevated ground with views available from Lisnagrot Road.
- 3.3 Due to the location of the woodland and that access to it requires informing the golf club of any assessment, a provisional TPO was served to allow for a full assessment of the woodland trees against the TPO criteria whilst also protected the trees in the interim.
- 3.4 The site under consideration was surveyed by a qualified arboriculturist. The Tree Survey Report states that the site *“presents of a bi-modal woodland structure, resulting in two distinct types of woodland. The elevated areas support a mature, dominant Oak canopy demonstrating good physiological health and vigorous natural regeneration through extensive self-seeding. This upper canopy is structurally complemented by a dense secondary woodland layer predominantly composed of Hazel and Holly, with occasional Sycamore and Cherry. Conversely, the lowland sections are characterized by waterlogged soil conditions that dictate a contrasting woodland composition. These areas*

are dominated by Downy Birch and Goat Willow, interspersed with Alder and Rowan, forming a dense structure or both single and multi-stemmed trees.” The report notes that access is restricted through much of the site. There are substantial tracts of the lowland woodland that remain impassable due to the high stem density of un-thinned growth, permanent surface water, boggy growth, or a combination of these.

- 3.5 The tree survey report has divided the site into seven woodland groups. Woodland Group No's. W001, W002 and W007 contain the long-established woodland, which can be viewed on historical maps dating back to 1838-1862. The remaining Woodland Groups (No's. W003, W004, W005, W006) are located in lowland / boggy areas.

Reason for Consideration of a TPO

- 3.6 On 23rd February 2026, a member of the public requested that the Council serve a TPO on this site to prevent trees being removed as a result of exploratory activities to create an additional golf hole at Kilrea Golf Club. Due to the location of the woodland and that access to it requires informing the golf course of any assessment, a provisional TPO was served to allow for a full assessment of the woodland trees against the TPO criteria whilst also protected the trees in the interim. When serving the provisional TPO, it became clear that some clear felling had taken place within woodland areas W006, W002 and W007.
- 3.7 A provisional TPO was served on site on 13th March 2026 (see Appendix 1). This notice took effect immediately and provided protection for all trees on site for a period of six months, until 13th September 2026. In line with legislation, a copy of the provisional TPO was also posted, on 13th March 2026, to inform interested parties and adjoining neighbours. Copies of the Order were also attached to protected trees in obvious locations within the site on 13th March 2026.
- 3.8 The consultation period allowed comments/representations to be submitted within 28 days from the date of Notice of the Provisional TPO (up to 13th May 2026). Two representations were submitted on behalf of Kilrea Golf Club.
- 3.9 The first representation (Appendix 2) objects to a TPO being served. This objection refers to the operational impact of a TPO at this location on Kilrea Golf Club, stating that the TPO would significantly impact the day-to-day management of the golf course due to the inability to carry out general maintenance such as pruning, thinning, removal etc. to maintain the playability, safety and turf health of the course.
- 3.10 The provisional TPO lies outside the current extent of the golf course. To minimise any operational impacts on Kilrea Golf Club in the future, the boundary of the provisional TPO site was set back by approximately 10m from the woodland margin. As a result, most trees along the golf course's edge are positioned outside the TPO boundary.

- 3.11 The objection then queries the amenity value of trees in question. The objection outlines that the trees sit within the grounds of the private golf course and argues that the trees 'do not hold any public amenity and any visual benefit is experienced by members of the golf course exclusively'. However, the course is not limited to golf club members only - tee time slots are available to all.
- 3.12 Further, in planning terms, golf courses (including privately owned ones) fall within the definition of Public Open Space (PPS 8, Annex A), and are of public value, and can also act as a visual amenity. Additionally, the woodland is partially on elevated ground with views available from Lisnagrot Road providing a substantial landscape feature and attractive entrance to Kilrea from the south.
- 3.13 The third point on this objection refers to restrictions on future development, outlining concerns that a TPO will hinder any future proposed changes to the golf course. Additionally, the objection outlines that 'there are no precedents for any TPO being placed on a golf course in Northern Ireland...'.
- 3.14 There is nothing in legislation that prohibits a TPO being placed on a golf course. Cushendall Golf Course is within the town's Conservation Area, within which trees are automatically protected as if by a TPO. Conversely, there is nothing in legislation that prohibits the placing of a golf course in an historic setting. The consideration in this instance relates to lands that have been identified by historic maps as relating to long-established woodland, which also have a public visual amenity role.
- 3.15 The second representation (Appendix 3) shows concept plans for Kilrea Golf Club. This document is dated January 2026 (prior to the provisional TPO being served). Presently, these are only concept plans and Kilrea Golf Club's Committee has not agreed to any plans within this document. The concept proposal for the second hole shows Hole 2's tee starting in W006, the fairway and rough etc. running thorough W006 before continuing through W002 and ending at the green in W007. Woodland Groups W002 and W007 relate to the long-established woodland.

Detailed Assessment of Trees

- 3.16 The site was surveyed on 31st July 2026 (see Appendix 4). A total of 7no. woodlands were identified, based on their location, ground conditions and tree mix. The report includes specific observations and recommendations for all woodlands.
- 3.17 The tree survey report outlines that all Woodland Groups are in a healthy condition and worthy of protection. Overall, the woodlands are in a good physiological and structural condition, displaying the classic indicators of a mature, well-established woodland. The elevated areas feature a dominant Oak canopy that is vigorously self-seeding, which allows the woodland to maintain continuous canopy cover without needing active planting interventions. This is complemented by a dense secondary layer of Hazel and Holly, alongside occasional Sycamore and Cherry. The lowland areas are waterlogged and offer

contrasting arboreal value with a dense structure of Downy Birch, Goat Willow, Alder, and Rowan. All woodland sites were given a 'B1' retention category.

- 3.18 Following receipt of the report, planning officials met club representatives on site to gain a better understanding of the course layout, and to discuss the club's proposed potential works and the potential implications of the provisional TPO. It is understood that the club does not envisage extending into the southern parts of the TPO, for example into Woodlands W003 and W004. The clearance that raised the original concern is located in Woodland W006, as shown in Photograph 4 in the tree survey report (Appendix 4), which is identified as a lowland area with high water movement/bog. The placing of a TPO will not prohibit the club's future aspirations, but may require some amendments to hole design, for example to the position or width of a fairway, to ensure the integrity of the TPO is not diminished. It is understood from discussions with the club representatives that the proposals are at a concept stage only. As such, design amendments can be incorporated if the proposals are firmed up.
- 3.19 On assessment of the report, the confirmation of the presence of a long-established woodland, and amenity value of the elevated long-established woodland, it is recommended that Woodland Groups W001, W002, W007 and a southern portion of W006 are protected. Woodlands W003, W004, W005 and W006 are located in lowland / boggy areas with limited amenity value and do not form part of the long-established woodland. This is shown in Recommended Map B (Appendix 5).

Summary

- 3.20 The site contains 7 woodlands, of these W001, W002 and W007 are considered to be worthy and suitable for TPO protection. These woodlands are long-established, are in excellent condition, and have high public amenity value.
- 3.21 TPO to be Confirmed, with Modification (as set out in Map B at Appendix 5), to include Woodlands W001, W002 and W007.

3.22 Financial Implications

- 3.23 No financial implications for the Council.

4.0 Options

- 4.1 **Option 1:** Resolve to confirm the TPO, with modifications, as detailed above.

Option 2: Resolve not to confirm the TPO.

5.0 Recommendation

- 5.1 **IT IS RECOMMENDED** that Members agree to either Option 1 or 2 above.

Appendices:

Appendix 1: Provisional TPO Notice and Map.

Appendix 2: Representation dated 10th July 2026

Appendix 3: Representation dated 25th July 2026

Appendix 4: Tree Survey Report (Inc Survey Table & Map).

Appendix 5: Recommended TPO Map B

**THE PLANNING ACT (NORTHERN IRELAND) 2011
THE PLANNING (TREES) REGULATIONS (NORTHERN
IRELAND) 2015**

TREE PRESERVATION ORDER

Lands adjacent to Kilrea Golf Club, 47A Lisnagrot Road, Kilrea

Causeway Coast and Glens Borough Council (in this Order called "the Council") in exercise of the powers conferred upon it by sections 122, 123 and 183(1) of the Planning Act (Northern Ireland) 2011(a) makes the following order:

No person shall, except with the consent of the Council and in accordance with the conditions, if any, imposed on such consent, cut down, uproot, top, lop, wilfully damage or wilfully destroy or cause or permit the cutting down, uprooting, topping, lopping, wilful damage or wilful destruction of any tree specified in Schedule 1 or comprised in a group of trees or in a woodland specified in that Schedule. the position of which trees, groups of trees or woodlands is defined in the manner indicated in Schedule 1 on the annexed maps which maps shall for the purpose of such definition prevail where any ambiguity arises between them and the specification in Schedule 1.

The Council directs that section 123 (provisional tree preservation orders) shall apply to this Order and, accordingly, this Order shall take effect provisionally on **13th March 2026**.

The Order is subject to the provisions of Schedule 2 and to the exemptions specified in Schedule 3.

Authorised by the Council to sign in that behalf on *13th March 2026*.


Authorised Officer

On behalf of: Causeway Coast and Glens Borough Council Planning Manager

SCHEDULE 1

All those trees contained within the area outlined in red on the attached Map A.

SCHEDULE 2

Application of provisions of the Planning Act (Northern Ireland) 2011

1.-(1) The provisions of sections 40, 58, 59, 60; 68, of the 2011 Act specified in column 1 of Part 1 of Schedule 4 of this Order shall have effect, in relation to consents under this Order and applications for such consent, subject to the adaptations and modifications mentioned in column 2.

(2) The provisions referred to in paragraph (1), as so adapted and modified, are set out in Part 2 of that Schedule.

Compensation

2. Subject to the provisions of this Order any person who has suffered loss or damage in consequence of—

- (a) any refusal of consent to cut down, uproot, top or lop a tree which is the subject of a tree preservation order; or
- (b) the granting of any such consent subject to conditions,

shall if they make a claim to the council within the time and in the manner prescribed by paragraph 5 be entitled subject to such exceptions as may be prescribed to recover from the council compensation in respect of such loss or damage.

3. No claim may be made under this Order if the amount in respect of which the claim would otherwise have been made is less than £500.

4. No compensation shall be payable to a person:

- (a) for loss of development value or other diminution in the value of the land;
- (b) for loss or damage which, having regard to the statement of reasons as set out in paragraph (5)(1) and any documents or other evidence submitted in support of any such statement, was not reasonably foreseeable when the consent was refused or was granted subject to conditions; or
- (c) for loss or damage reasonably foreseeable by that person and attributable to his or her failure to take reasonable steps to avert the loss or damage or to mitigate its extent.

5.-(1) A claim for compensation shall be in writing, stating the reasons for that claim and shall be made by serving it on the council.

(2) The time within which any such claim shall be made shall be a period of six months from the date of the decision of the council, or where an appeal has been made to the planning appeals commission against the decision of the council from the date of the decision of the commission on the appeal.

6. The Lands Tribunal shall determine any question of disputed compensation.

NOTE: Any person who, in contravention of the provisions of this Order cuts down, uproots or wilfully destroys a tree, or wilfully damages, tops or lops a tree in such a manner as to be likely to destroy it is guilty of an offence under section 126 (penalties for contravention of tree preservation orders) of the Planning Act (Northern Ireland) 2011 and liable on summary conviction to a fine not exceeding £100,000; and on conviction on indictment, to a fine. In determining the amount of fine to be imposed on a person convicted of such an offence the court must in particular have regard to any financial benefit which has accrued or appears likely to accrue to that person in consequence of the offence.

Any person who contravenes the provisions of this Order otherwise than as mentioned above, shall be guilty of an offence and liable on summary conviction to a fine not exceeding level 4 on the standard scale.

SCHEDULE 3

This Order shall not apply to require the consent of the council to:

1. The cutting down, uprooting, topping or lopping of a tree exempted from the provisions of this Order by section 122(5) of the Planning Act (Northern Ireland) 2011 namely a tree which is dead or has become dangerous, or the cutting down, uprooting, topping or lopping of which is in compliance with obligations imposed by or under any statutory provision or so far as may be necessary for the prevention or abatement of a nuisance.

2. The cutting down, uprooting, topping or lopping of a tree—

- (a) in pursuance of the power conferred on the operator by virtue of section 106 of the Communications Act 2003(a) and paragraph 19 of Schedule 2 to the Telecommunications Act 1984(b);
- (b) by a statutory undertaker (defined as such by Section 250 of the Planning Act (Northern Ireland) 2011), where the land on which the tree is situated is operational land (as defined in the Planning (General Permitted Development) Order (Northern Ireland) 2015(c)) of the statutory undertaker and the work is necessary—
 - (i) in the interests of the safe operation of the undertaking;
 - (ii) in connection with the inspection, repair or renewal of any sewers, mains, pipes, cables or other apparatus of the statutory undertaker; or
 - (iii) to enable the statutory undertaker, to carry out development permitted by or under the Planning (General Permitted Development) Order (Northern Ireland) 2015;
- (c) where required for the purpose of carrying out development authorised by planning permission granted (other than an outline planning permission) on an application made under Part 3 of the Planning Act (Northern Ireland) 2011;
- (d) which is a fruit tree cultivated for the production of fruit in the course of a business or trade where such work is in the interests of that business or trade;
- (e) where required to enable the implementation of an order made under Articles 4(1), 5(1), 6, 14(1), 15(1), 18(1) and 68(1) of the Roads (Northern Ireland) Order 1993(d) or
- (f) where that work is urgently necessary for national security purposes.

3. The pruning, in accordance with good horticultural practice, of any tree cultivated for the production of fruit

(a) 2003 c. 21

(b) 1984 c 12

(c) S R. 2015 no.70

(d) 1993 No. 3160 (N.I 15)

SCHEDULE 4 PART 1

Adaptation of sections 40, 58, 59, 60 and 68 of the Planning Act (Northern Ireland)
2011

Column 1: Provision of the 2011 Act	Column 2: Adaptation or Modification
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Section 40	Substitute this section with- "Application for consent to cut down, uproot, top or lop trees 40.(1) An application for consent made to the council shall be in writing containing a statement of reasons for making the application, and specifying, by reference if necessary to a map, the trees or woodland to which the application relates and the operations for which consent is required. (2) The council may grant consent to an application either unconditionally, or subject to such conditions (including conditions requiring the replacement of any tree or trees) as the council may think fit, or may refuse consent."
Section 58(1)	Omit "-" and "(a)" For the words "planning permission to develop land" substitute "consent under a tree preservation order". Omit paragraphs (b) and (c). For the words "permission, consent, agreement or approval" substitute "consent".
Section 58(2)	Omit.
Section 58(3)	For the number "(3)" substitute "(2)".
Section 58(4)	For the number "(4)" substitute "(3)".
Section 58(5)	Omit the words ",subject to subsections (5) to (7),". Substitute this subsection with— "(4) Where an appeal is brought under this section, the commission must afford both the appellant and the council the opportunity of— (a) appearing before and being heard by the commission; or (b) submitting to the commission a written statement within such period and in respect of such matters as the commission may specify to them by notice in writing."
Section 58(6)	For the number "(6)" substitute "(5)".
Section 58(7)	Omit.
Section 59(1)	Omit the words "or as the case may be, the Department".
Section 60	After the words "section 58(1)" insert the words "as applied and modified by the Planning (Trees) Regulations (Northern Ireland) 2015".

Omit the words "either—", "(a)", and "; or" in paragraph

(a).

Omit paragraph (b).

Omit paragraph (c).

For subparagraphs "(i)" and "(ii)" substitute "(a)" and

"(b)" and for the words "permission, consent, agreement or approval" substitute "consent".

Section 68

In the title omit the words "planning permission" and substitute "consent under a tree preservation order". Substitute the section with the following-

"(1) If it appears to a council that it is **expedient** to revoke or modify any consent under a tree preservation order, the council may, subject to subsections (3), (4) and (5) by order revoke or modify the consent to such extent as it considers expedient.

(2) Without prejudice to the generality of subsection (1), a council may have regard to any material change in circumstances that has occurred since the consent was granted.

(3) The power conferred by this section to revoke or modify consent under a tree preservation order maybe exercised at any time before the **operations** for which consent has been given have been completed, but any such revocation or modification shall not affect so much of those **operations** as has been carried out.

(4) Where the council makes an order under this section it must serve a notice on-

(a) the person who applied for the consent;

(b) the owner and occupier of the land affected; and

(c) any other person who, in its opinion, would be **affected** by the order.

(5) An order under this section shall take effect on the day after that on which the council complies with the requirements of subsection (4)."

PART 2

Sections 40, 58, 59, 60 & 68 of the Planning Act (Northern Ireland) 2011 as adapted or modified

Application for consent to cut down, uproot, top or lop trees

40.-(1) An application for consent made to the council shall be in writing containing a statement of reasons for making the application, and specifying, by reference if necessary to a map, the trees or woodland to which the application relates and the operations for which consent is required.

(2) The council may grant consent to an application either unconditionally, or subject to such conditions (including conditions requiring the replacement of any tree or trees) as the council may think fit, or may refuse consent.

Appeals

58.-(1) Where an application is made to a council for consent under a tree preservation order then if that consent is refused or is granted subject to conditions, the applicant may by notice in writing appeal to the planning appeals commission.

(2) Any notice under this section must be served on the planning appeals commission within 4 months from the date of notification of the decision to which it relates or such other period as may be specified by development order.

(3) Where an appeal is brought under this section from a decision of a council, the planning appeals commission may allow or dismiss the appeal or may reverse or vary any part of the decision whether the appeal relates to that part thereof or not and may deal with the application as if it had been made to it in the first instance.

(4) Where an appeal is brought under this section, the commission must afford both the appellant and the council the opportunity of—

- (a) appearing before and being heard by the commission; or
- (b) submitting to the commission a written statement within such period and in respect of such matters as the commission may specify to them by notice in writing.

(5) If at any time before or during the determination of an appeal under this section it appears to the planning appeals commission that the appellant is responsible for undue delay in the progress of the appeal, it may—

- (a) give the appellant notice that the appeal will be dismissed unless the appellant takes, within the period specified in the notice, such steps as are specified in the notice for the expedition of the appeal; and
- (b) if the appellant fails to take those steps within that period, dismiss the appeal accordingly.

Matters which may be raised in an appeal under section 58

59.-(1) In an appeal under section 58, a party to the proceedings is not to raise any matter which was not before the council at the time the decision appealed against was made unless that party can demonstrate to the satisfaction of the planning appeals commission—

- (a) that the matter could not have been raised before that time, or
- (b) that its not being raised before that time was a consequence of exceptional circumstances.

(2) Nothing in subsection (1) affects any requirement or entitlement to have regard to-

(a) the provisions of the local development plan, or

(11) any other material consideration.

Appeal against failure to take planning decision

60. Where any such application as is mentioned in section 58(1) as applied and modified by the Planning (Trees) Regulations (Northern Ireland) 2015 is made to a council, then unless within such period as may be specified by a development order, or within such extended period as may be agreed upon in writing between the applicant and the council, the council gives notice to the applicant of its decision on the application, section 58 shall apply in relation to the application-

(a) as if the consent to which it relates had been refused by the council; and

(b) as if notification of the council's decision had been received by the applicant at the end of the period so specified, or at the end of the said extended period, as the case may be.

Revocation or modification of consent under a tree preservation order by council

68.-(1) If it appears to a council that it is expedient to revoke or modify any consent under a tree preservation order, the council may, subject to subsections (3), (4) and (5) by order revoke or modify the consent to such extent as it considers expedient.

(2) Without prejudice to the generality of subsection (1), a council may have regard to any material change in circumstances that has occurred since the consent was granted.

(3) The power conferred by this section to revoke or modify consent under a tree preservation order may be exercised at any time before the operations for which consent has been given have been completed, but any such revocation or modification shall not affect so much of those operations as has been carried out.

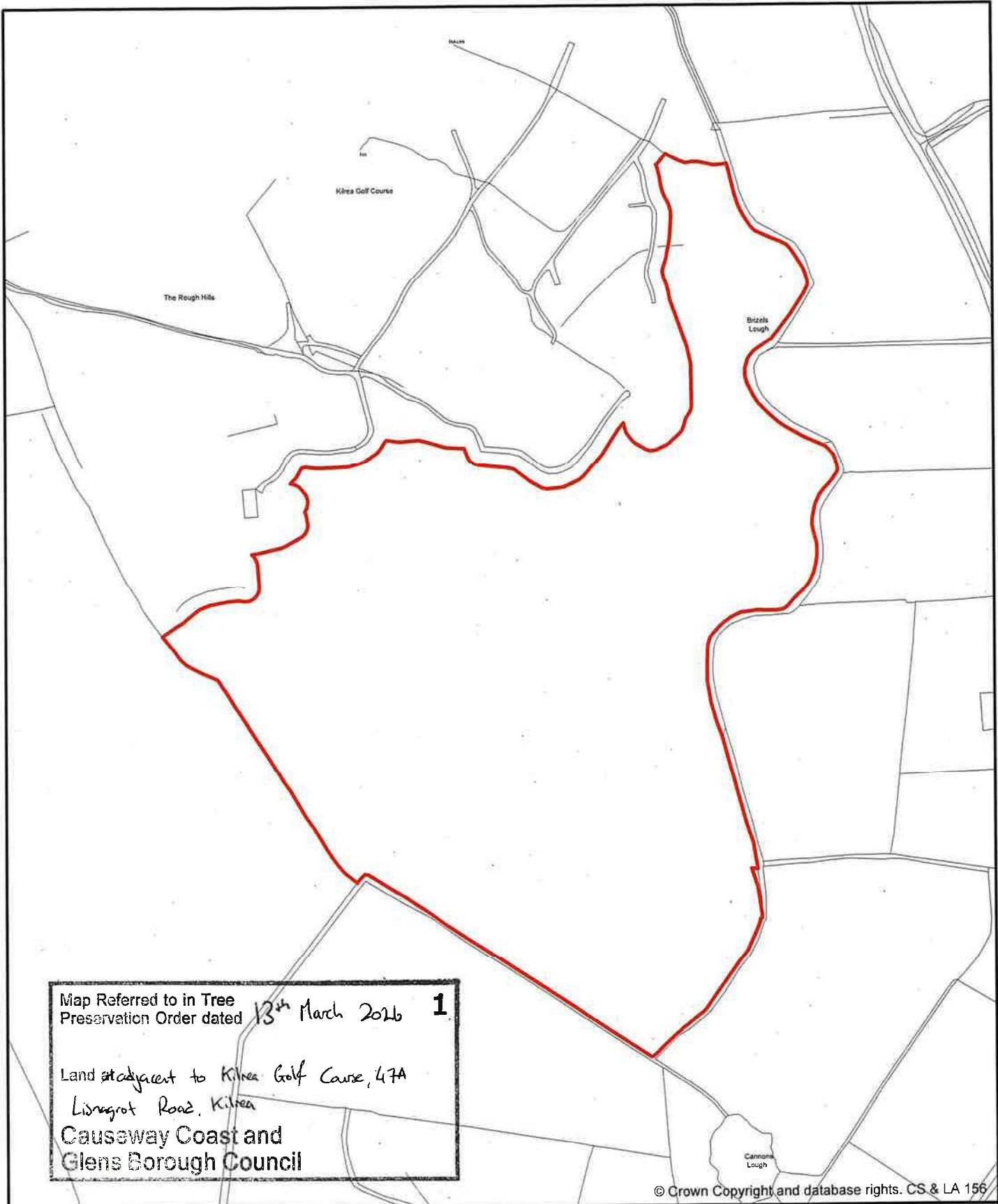
(4) Where the council makes an order under this section it must serve a notice on-

(a) the person who applied for the consent;

(b) the owner and occupier of the land affected; and

(c) any other person who, in its opinion, would be affected by the order.

(5) An order made under this section shall take effect on the day after that on which the council complies with the requirements of subsection (4)



Map A
Tree Preservation Order (TPO) - LA01/2026/0024/TPO

Location: Lands adjacent to Kilrea Golf Course, 47A Lisnagrot Road, Kilrea
Dated: 13th March 2026

 Tree Preservation Order

0 60 120 Metres



Causeway Coast and Glens
Planning Department
Cloonavin
66 Portstewart Road
Coleraine
BT52 1EY

Project no: **2023-0554**
Project ref: **Kilrea Golf Club**
Planning ref: **LA01/2026/0024/TPO**
10th July 2026

For the attention of Shaun Henderson,

I, Steven Moon, am writing on behalf of Kilrea Golf Club to lodge a formal objection to the provisional Tree Preservation Order (TPO) issued on the 13th March 2026 under reference LA01/2026/0024/TPO regarding land adjacent to Kilrea Golf Club, 47A Lisnagrot Road.

I object to the TPO on the following grounds;

1. Operational Impact

The restrictions imposed by an emergency TPO in relation to the day-to-day management of the golf course will be significantly impacted due to the inability to carry out general maintenance such as pruning, thinning, removal etc. to maintain the playability, safety and turf health of the course. A TPO will delay or prevent these interventions leading to overgrowth/overshadowing and potentially unstable trees which will have an impact on how the course is experienced and the general playability of the course which can have a long-term impact on the economic viability of the course. The requirement to seek formal consent for potential remedial works introduces administrative delays and costs which can undermine the feasibility of undertaking the work and can lead to the course falling into a state of disrepair.

2. Amenity

The council has argued that the reasoning behind enforcing the emergency TPO pursuant to sections 122 and 123 of the planning act 2011 and the provisions of the planning (Trees) regulations (Northern Ireland) 2015 was principally regarding the amenity value of the trees. The trees in question sit within the grounds of the private golf course and therefore do not hold any public amenity and any visual benefit is experienced by members of the golf course exclusively. Therefore, the amenity in question is intrinsically linked to the playability and golf experience of the members which will significantly be undermined by the enforcement of the TPO.

3. Restrictions on future development

One of the most significant impacts that a TPO will have on the golf course is the long-term impact on the growth and development of the course, the restrictions that this will place on any future proposed changes will significantly be hindered. Without the proper means to expand and develop over time the golf course will become stagnant and the economic viability of sustaining the course will come into question.

There are no precedents for any TPO being placed on a golf course in Northern Ireland for the reasons listed above

as the enforcement would have significant long-term impacts on the general maintenance of the golf course and make it entirely unsustainable to run leading to the club's eventual decline.

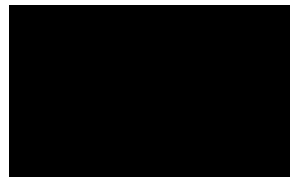
We would like to formally request an on-site meeting at your earliest convenience regarding the above. Please let us know any available dates and times you have to discuss the emergency TPO directly on site, as we believe a physical walkthrough would be significantly more beneficial to clarify the specific context.

We look forward to hearing your response, please do not hesitate to contact us on the number below.

Yours Sincerely



Steven Moon
for mcgarry-moon architects



T: 



JULY 31, 2026

TREE SURVEY REPORT

Lands at Kilrea Golf Course

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INDEPENDENT ARBORICULTURAL CONSULTANT



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Ref: Lands at Kilrea Golf Course

Survey details

This tree survey report was requested by Causeway Coast and Glens Borough Council and concerns the tree population growing around the above site.

All information provided to the author of this report is assumed to be accurate.

The scope of this report is to complete a woodland tree survey of the trees and offer information to inform a Tree Preservation order.

The survey was carried out using Visual Tree Assessment (VTA) methodologies from ground level only. No below ground, invasive or destructive tests were undertaken. No soil / root samples were taken for analysis.

Weather conditions during the survey were dry with a light wind.

Due to the changing nature of trees and other site circumstances this report and any recommendations made are limited to a 1-year period. Any alteration to the subject site, trees or any development could change the current circumstances and may invalidate this report and any recommendations made.

The report is valid only for normal weather conditions. Healthy trees or parts of healthy trees may fail in normal weather situations although the risk is significantly increased in storm conditions and as the consequences of such weather phenomena are unforeseeable the tree surveyor cannot be held liable for any such failures.

Any alteration or deletion from this report shall invalidate it as a whole.

Site details

A large area of woodland with raised and low land. Several open areas exist within the woodlands- these may be natural or man made. A curving strip of manmade clearance runs from W006 to W003 bisecting the woods on its path.

Woodland details

The surveyed site presents a bi-modal woodland structure, resulting in two distinct types of woodland. The elevated areas support a mature, dominant Oak canopy demonstrating good physiological health and vigorous natural regeneration through extensive self-seeding. This upper canopy is structurally complemented by a dense secondary woodland layer predominantly composed of Hazel and Holly, with occasional Sycamore and Cherry. Conversely, the lowland sections are characterized by waterlogged soil conditions that

dictate a contrasting woodland composition. These areas are dominated by Downy Birch and Goat Willow, interspersed with Alder and Rowan, forming a dense structure of both single and multi-stemmed trees.

Access is highly restricted throughout much of the site. Substantial tracts of the lowland woodland remain impassable due to the high stem density of unthinned growth, permanent surface water, boggy ground or a combination.

Overall, the trees demonstrate good physiological and structural condition, displaying the classic indicators of a mature, well-established woodland. These indicators include:

- **Vigorous Natural Succession:** Extensive self-seeding, particularly within the Oak stands, indicates robust physiological health and a self-sustaining woodland capable of maintaining continuous canopy cover without the need for active planting interventions.
- **Favourable Canopy Dynamics:** The trees exhibit typical mature forms with well-developed crowns and a stratified canopy structure. This indicates successful light partitioning, healthy foliage mass, and good overall vitality throughout the woodland.
- **Expected Structural Features:** The presence of occasional minor storm damage and standing deadwood is entirely consistent with a mature, unmanaged woodland of this age. From a structural assessment perspective, these features are natural components of the trees' senescence and life cycle; given the remote, inaccessible areas of the woodland they occupy, they present negligible target risk.
- **Optimal Rooting Environment:** The undisturbed nature of the site provides a stable rooting environment free from compaction, soil sealing, or mechanical root severance. Even with localized waterlogging in the lower woodland sections, the adapted tree species (Willow, Alder, Birch) are functioning with natural root morphology and structural stability.

There are a number of other properties of separate ownership bordering the site.

BS5837 Category

Trees have been assigned a Bs5837 category to provide an additional layer of information. A brief summary of each category can be found below.

B- Trees assigned to this category include healthy attractive trees with remediable defects that are in a condition as to be able to make a significant contribution for a minimum of 20 years.

C- Trees in this category include unremarkable trees of limited merit, small-growing, young species which have a relatively low potential amenity value, and low landscape benefits.

U- Trees assigned to this category are in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years and/or are unsuitable for retention in the proximity of new dwellings or areas of public open space.

See Appendix 1 for full definitions of each category.

Trees suitable for retention

Where possible, it is generally considered desirable for Category 'A' and Category 'B' trees to be retained. Category 'U' trees are not considered to be appropriate for retention.

Other factors worth consideration in long term management include:-

- Shading
- Future Pressure for Tree Removal and Pruning
- Seasonal Nuisance
- Infrastructure
- Direct Damage
- Root Protection Areas
- Future Management
- Demolition/Ground Works
- Construction Activity

Recommendations

All recommendations are as per the survey schedule below. Recommendations are based on the site at present and may change as its usage develops.

Andrew Boe *BSc (Hons) MArborA*

Photographic Record



Photograph 1. Within Woodland W001



Photograph 2. Within Woodland 3 W003.



Photograph 3. Within Woodland 3 W003.



Photograph 4. Looking NE into Woodland 6 W006. The cleared strip is visible here.



Photograph 5. Open area Within Woodland 3 W003.

Bibliography

Web Information & Bibliography Web Information

Health and Safety

Executive - http://www.hse.gov.uk/foi/internalops/sims/ag_food/010705.htm

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- Lonsdale, D (1999) Principle of Tree Hazard Assessment and Management Edinburgh; Forestry Commission
- Mattheck, C (2007) Field Guide for Visual Tree Assessment Germany; Karlsruhe Research Centre
- Shigo, A.L (1991) Modern Arboriculture USA; Shigo and Trees, Association
- Sterry, P (2007) Collins Complete British Trees London; Collins
- Strouts, R.G (2000) Diagnosis of ill-health in trees Edinburgh; Forestry Commission
- Weber, K & Mattheck, C (2003) Manual of wood decay UK; Arboricultural Association

Tree survey Schedule Key.

The following information is collected for each tree.

- Sequential reference number;
- Structure;
- Species;
- Height in M;
- Stem diameter in mm;
- Branch spread in Metres.
- Life stage;
 - Y – Young,
 - SM – Semi Mature,
 - EM – Early Mature,
 - M – Mature,
 - OM – Over Mature
- Estimated remaining contribution in years.
- General observations, particularly of structural and/or physiological condition.
- Category 'U' or 'A' to 'C' grading with the subcategory 1, 2 or 3 reflecting arboricultural, landscape or cultural values, respectively. See Appendix 1.
- RPA. Root Protection radius in M and Root Protection Area in sqm
- Recommendations for tree work.

TPO Woodland Assessment

Causeway Coast and Glen's Borough Council
kilrea golf club with boundary

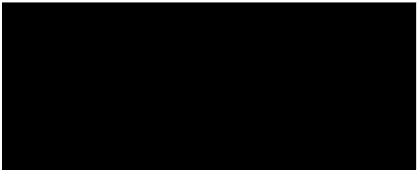
Retention Category	Woodlands
B	7

Rem. Contrib.	No. trees
50+ Years	7



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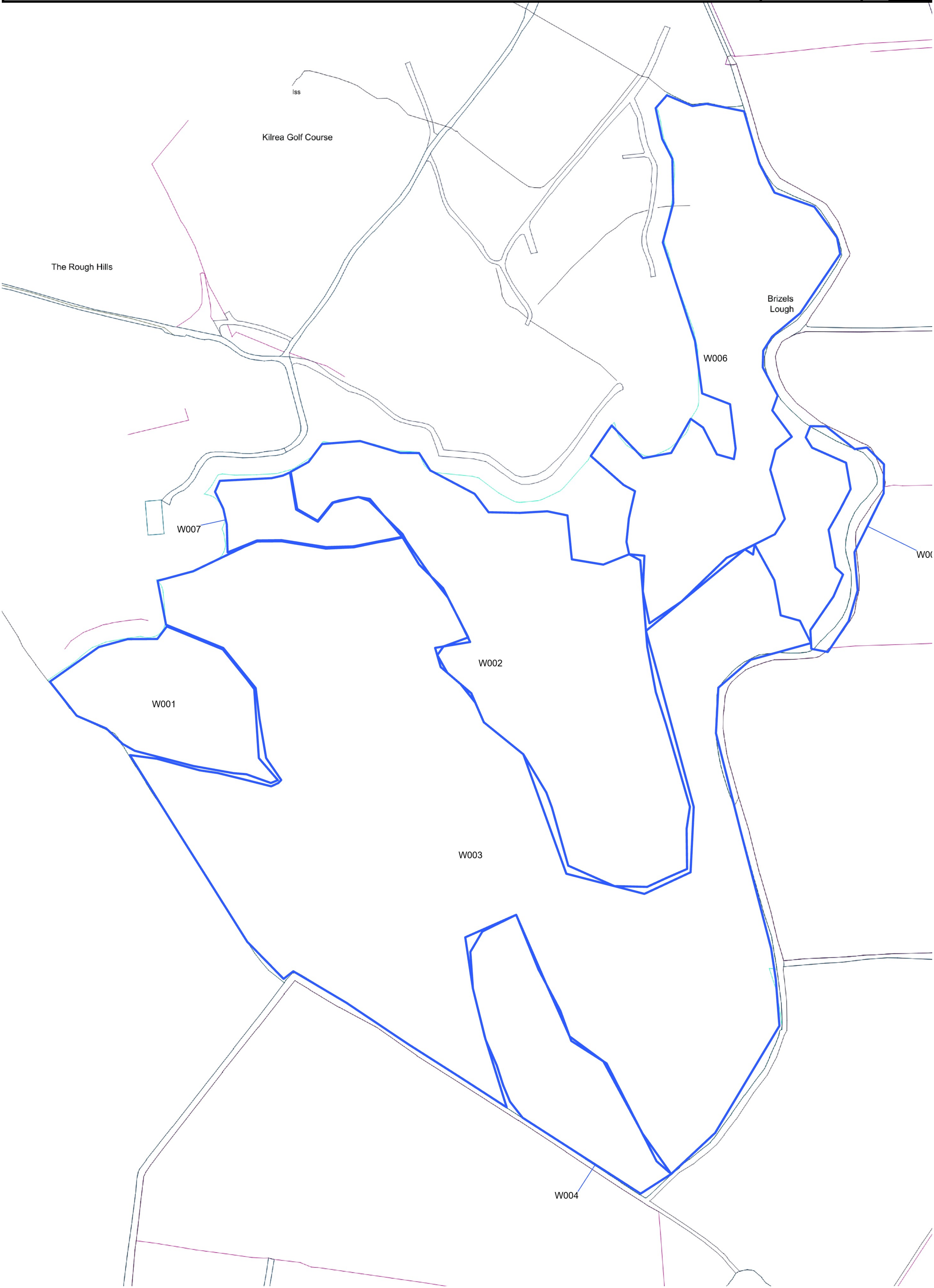
Total	7
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-BS5837 Tree Surveys, Tree Constraints Plans-
-Arboricultural Impact Assessments
-Arboricultural Method Statements
-Tree Protection Plans
-Arboricultural Supervision and Site Monitoring-
-Mortgage Tree Report-



Ref.	Species	Full Structure	Measurements	Survey Notes	Retention Category	RPA	Measurements2	Recommendations	TPO
W001	Mixed woodland (100%) (Mixed woodland)	Group	Height (m): 18 Stem Diam(mm): 800 Spread (m): 7N, 7E, 7S, 7W Crown Clearance (m): 2 Lowest Branch (m): 2(S) Life Stage: Mature Rem. Contrib.: 50+ Years	This area of mature Oak woodland is on higher ground. There is extensive evidence of self-seeding. Other species include Holly, Hazel with occasional Cherry and Sycamore. A small number of trees show storm damage which is normal for a woodland of this age.	B1	Area: 7060 sq m.	Other Reference: Physiological Cond: Fair Structural Cond: Fair	No action required	Yes
W002	Mixed woodland (100%) (Mixed woodland)	Group	Height (m): 18 Stem Diam(mm): 600 Spread (m): 5N, 5E, 6S, 5W Crown Clearance (m): 2 Lowest Branch (m): 2(S) Life Stage: Mature Rem. Contrib.: 50+ Years	This second area of mature Oak woodland is again on higher ground/ ridge. There is extensive evidence of self-seeding. Other species include Holly, Hazel with occasional Cherry and Sycamore. A small number of trees show storm damage which is normal for a woodland of this age. A section has been removed some time in the past that bisects the woodland. Ivy throughout.	B1	Area: 24355 sq m.	Other Reference: Physiological Cond: Fair Structural Cond: Fair	No action required	Yes

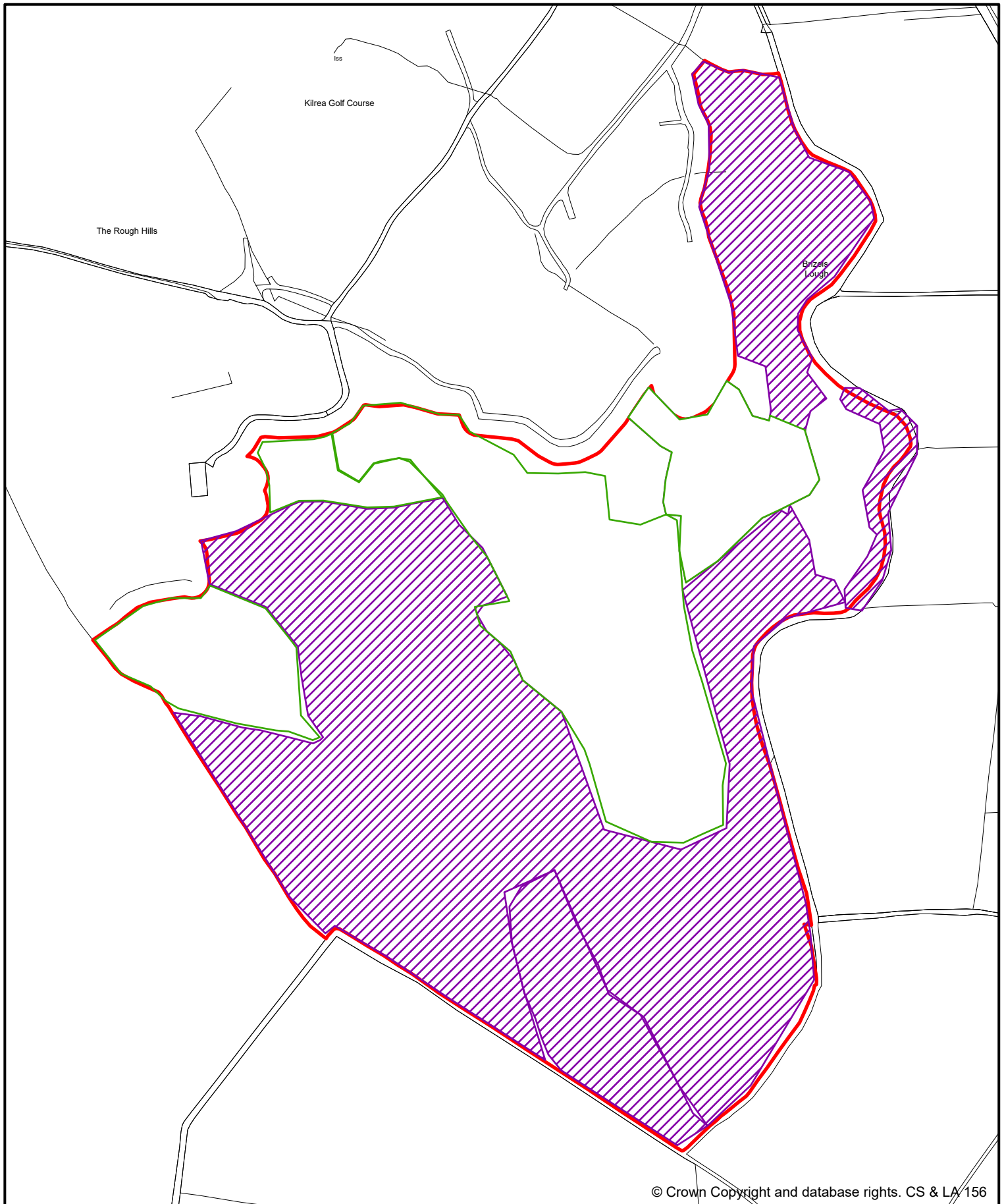
Ref.	Species	Full Structure	Measurements	Survey Notes	Retention Category	RPA	Measurements2	Recommendations	TPO
W003	Mixed woodland (100%) (Mixed woodland)	Group	Height (m): 15 Stem Diam(mm): 500 Spread (m): 4N, 4E, 4S, 4W Crown Clearance (m): 2 Lowest Branch (m): 2(S) Life Stage: Mature Rem. Contrib.: 50+ Years	Predominantly Downy Birch and Willow with occasional Alder, Rowan. Evidence of waterlogging/ boggy in large areas to east and south mainly. Lowland. Dense woodland group of trees which is largely unpassable. Ivy throughout. Several dead trees within the group are well away from paths and present a wildlife resource. A mixture of single and multi-stemmed trees. No apparent thinning due to density. Several open area or heather or grass which may be permanent	B1	Area: 68793 sq m.	Other Reference: Physiological Cond: Fair Structural Cond: Fair	No action required	Yes
W004	Mixed woodland (100%) (Mixed woodland)	Group	Height (m): 8 Stem Diam(mm): 200 Spread (m): 3N, 3E, 3S, 3W Crown Clearance (m): 2 Lowest Branch (m): 2(S) Life Stage: Mature Rem. Contrib.: 50+ Years	Sparse area due to suspected water levels. Birch and Willow. No access.	B1	Area: 7628 sq m.	Other Reference: Physiological Cond: Fair Structural Cond: Fair	No action required	Yes
W005	Mixed woodland (100%) (Mixed woodland)	Group	Height (m): 12 Stem Diam(mm): 200 Spread (m): 3N, 3E, 3S, 3W Crown Clearance (m): 2 Lowest Branch (m): 2(S) Life Stage: Mature Rem. Contrib.: 50+ Years	Bog area with sparse trees. Predominantly Birch and Willow. A mixture of single and multi-stemmed trees. Limited access.	B1	Area: 2550 sq m.	Other Reference: Physiological Cond: Fair Structural Cond: Fair	No action required	Yes
W006	Mixed woodland (100%) (Mixed woodland)	Group	Height (m): 15 Stem Diam(mm): 300 Spread (m): 3N, 3E, 3S, 3W Crown Clearance (m): 2 Lowest Branch (m): 2(S) Life Stage: Mature Rem. Contrib.: 50+ Years	Lowland area with high water movement/ Bog. Predominantly Birch and Goat Willow with occasional Rowan and Alder. A mixture of single and multi-stemmed trees. Strip removed in the past running North South mainly. Several dead trees within the group are well away from paths and present a wildlife resource.	B1	Area: 19086 sq m.	Other Reference: Physiological Cond: Fair Structural Cond: Fair	No action required	Yes
W007	Mixed woodland (100%) (Mixed woodland)	Group	Height (m): 10 Stem Diam(mm): 200 Spread (m): 3N, 3E, 3S, 3W Crown Clearance (m): 2 Lowest Branch (m): 2(S) Life Stage: Mature Rem. Contrib.: 50+ Years	Multi-stemmed Hazel area forming a thicket in valley between higher ground.	B1	Area: 2999 sq m.	Other Reference: Physiological Cond: Fair Structural Cond: Fair	No action required	Yes



Appendix 1.

BS5837:2012 Table 1 – Cascade chart for tree quality assessment

Category and definition	Criteria (including subcategories where appropriate)			Identification on plan
Trees unsuitable for retention (see Note)				
Category U Those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years	- Trees that have a serious, irremediable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other category U trees (e.g. where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning) - Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline - Trees infected with pathogens of significance to the health and/or safety of other trees nearby, or very low quality trees suppressing adjacent trees of better quality <i>NOTE Category U trees can have existing or potential conservation value which it might be desirable to preserve; see [BS5837:2012] 4.5.7.</i>			
	1 Mainly arboricultural qualities	2 Mainly landscape qualities	3 Mainly cultural values, including conservation	
Trees to be considered for retention				
Category A Trees of high quality with an estimated remaining life expectancy of at least 40 years	Trees that are particularly good examples of their species, especially if rare or unusual; or those that are essential components of groups or formal or semi-formal arboricultural features (e.g. the dominant and/or principal trees within an avenue)	Trees, groups or woodlands of particular visual importance as arboricultural and/or landscape features	Trees, groups or woodlands of significant conservation, historical, commemorative or other value (e.g. veteran trees or wood-pasture)	
Category B Trees of moderate quality with an estimated remaining life expectancy of at least 20 years	Trees that might be included in category A, but are downgraded because of impaired condition (e.g. presence of significant though remediable defects, including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category A designation	Trees present in numbers, usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality	Trees with material conservation or other cultural value	
Category C Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150 mm	Unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories	Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value; and/or trees offering low or only temporary/transient landscape benefits	Trees with no material conservation or other cultural value	



**Causeway
Coast & Glens
Borough Council**

Map B

Tree Preservation Order (TPO) - LA01/2026/0024/TPO

Location: Lands adjacent to Kilrea Golf Club

Dated:



Tree Preservation Order



Woodland Not Recommended to be Covered by TPO



Woodland Recommended to be Protected by TPO

