

Title of Report:	Planning Committee Report – LA01/2023/1085/F
Committee Report Submitted To:	Planning Committee
Date of Meeting:	22nd April 2026
For Decision or For Information	For Decision
To be discussed In Committee YES/NO	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	Principal Planning Officer

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

Legal Considerations	
Input of Legal Services Required	NO
Legal Opinion Obtained	NO

Screening Requirements	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	Screening Completed:	N/A	Date:

Assessment (DPIA)	DPIA Required and Completed:	N/A	Date:
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<u>App No:</u>	LA01/2023/1085/F	<u>Ward:</u>	Dundooan
<u>App Type:</u>	Full Planning		
<u>Address:</u>	Craigahulliar Holiday Park, 23 Ballymacrea Road, Portrush (including Land to South of existing holiday park)		
<u>Proposal:</u>	Extension of existing holiday park including design amendments to part of previously approved holiday park layout (approved under planning permission C/2013/0097/F). Demolition of former Production Building and associated landscaping. Temporary foul cesspool (pending connection to public foul sewer)		
<u>Con Area:</u>	N/A	<u>Valid Date:</u>	26.10.23
<u>Listed Building Grade:</u>	N/A		
Applicant:	Blairs Caravans Limited		
Agent:	David Dalzell		
Objections:	2	Petitions of Objection:	0
Support:	0	Petitions of Support:	0

Executive Summary

- This proposal is considered acceptable at this location having regard to the Northern Area Plan 2016 and all other material considerations.
- The site is located within the open countryside as designated by NAP 2016.
- The site adjoins and is partially within Craigahulliar ASSI which is designated for its geological features of special interest.
- The proposed development comprises an extension to an existing holiday park to create 35 plots for static caravans.
- 2 letters of objection have been received in relation to this application.
- The proposal does not result in any unacceptable visual impact, harm to rural character and integrates appropriately into the surrounding area.
- There are no objections in relation natural heritage matters.
- The proposal would not have an adverse effect on the integrity of any European site either alone or in combination with other plans or projects.
- The proposal will not adversely harm neighbouring residential amenity.
- There are no archaeological or built heritage concerns.
- There are no objections from a drainage or flood risk perspective.
- There are no objections in relation to contamination.
- The proposed development has satisfactory access.
- The proposal complies with all relevant planning policies including the Northern Area Plan, SPPS Ed 2, PPS 2, PPS 3, PPS 6, PPS 15, PPS 16 and PPS 21.

Drawings and additional information are available to view on the Planning Portal- <https://planningregister.planningsystemni.gov.uk>

1.0 RECOMMENDATION

- 1.1 That the Committee has taken into consideration and agrees with the reasons for the recommendation set out in section 9 and the policies and guidance in sections 7 and 8 and resolves to **APPROVE** planning permission subject to the conditions set out in section 10.

2.0 SITE LOCATION & DESCRIPTION

- 2.1 The application site is located at Craigahulliar Holiday Park and includes lands associated with the holiday park and lands directly to the south. The lands associated with the existing holiday park include the vehicular access to Ballymacrea Road and the internal site roads leading to the southern end of the site. At the southern end of the site is a warehouse style building surrounded by hardstanding. A laneway runs from this building, rising to the south before continuing to rise, turning east and then north to the main area of the site where development of the caravan plots is primarily proposed. This area is primarily flat with areas of stone, spoil piles and vegetation. The highest point of the site is an area to the north. The western boundary of the site and the slopes associated with the raised main site area is densely vegetated.
- 2.2 The land to the eastern side of this area falls away to a settlement pond and is currently an open and undefined boundary. This pond and lands to the east/south-east are associated with a landfill site within ownership of the Council. Separate roads associated with this landfill site run north parallel to the site to meet the shared access to Ballymacrea Road. To the west of the site are areas of housing along Craigahulliar Road and Skerry View. Single dwellings are also located throughout the surrounding area along both Ballymacrea Road and Craigahulliar Road.

- 2.3 The existing holiday park site and the area for the proposed extension relates to lands associated with the former Craigahulliar Quarry.
- 2.4 The site both adjoins and is partly inside the designation Craigahulliar ASSI which is designated for its geological features of special interest.
- 2.5 The site is located outside any settlement development limit as designated under NAP 2016. The site has no land use zonings or designations within Northern Area Plan 2016. The site has an archaeological site and monument (unscheduled) indicated within the site. Ballymacrea Road from which the site is accessed is indicated to form a part of an existing cycle route.

3.0 RELEVANT HISTORY

- 3.1 LA01/2024/1187/F - Craigahullier Landfill Site, Ballymacrea Road, Portrush BT56 8NS
Use of existing waste transfer station to allow for storage and transfer of dry recyclables and mixed municipal wastes due to closure of existing landfill site. (Amendment to planning permission (C/2002/1040/F – Shed for the storage and transfer of dry recyclables.)
Approval – 06.10.25
- 3.2 LA01/2024/0485/F
Craigahulliar Holiday Park, 23 Ballymacrea Road, Portrush
Retention of design amendments to previously approved caravan park (approved under planning permission C/2013/0097/F), including 14no. caravan pitches suitable for static caravans in lieu of 3no. approved static caravan pitches, 3no. approved touring caravan pitches and 8no. approved camping cabins (the same number of units overall), Games Hut (on the site of an existing building now demolished), Multi Use Games Area (MUGA) with associated perimeter and ball fencing and netting, retaining walls, screen fencing, associated roadways, landscaping and external lighting.
Approval – 14.11.2024

- 3.3 LA01/2023/0418/F
Refurbishment and conversion of former blacksmith's forge to dwelling. Refurbishment and conversion of shed to dwelling. Demolition of former showroom and weighbridge building. Associated landscaping and access works
Under Consideration
- 3.4 LA01/2023/0417F
175m SSE of 23 Ballymacrea Road, Portrush
Refurbishment and conversion (former workshop to a dwelling and former canteen to a garage) with associated landscaping and access
Approval – 03.02.2025
- 3.5 LA01/2023/0126/PAN
Craigahulliar Holiday Park and lands South of 23 Ballymacrea Road, Portrush, BT56 8NS
Extension of existing holiday park including design amendments to part of previously approved holiday park layout (approved under planning permission C/2013/0097/F). Demolition of former production building and replacement with new building for storage of caravan park plant, equipment and materials.
Accepted – 13.02.23
- 3.6 LA01/2022/0080/F
Craigahulliar Holiday Park, 23 Ballymacrea Road, Craigahulliar
Retention of design amendments to previously approved caravan park (approved under planning permission C/2013/0097/F), including 59no. caravan pitches suitable for static caravans in lieu of 48no. approved touring caravan pitches and 14no. approved static caravan pitches (a reduction from 62no. approved to 59no. pitches constructed), Laundry Building in lieu of Amenity Caravan, relocation of Bin Store and Gas Tank Compound. Reconfiguration of Play Area.
Approved – 11.01.23
- 3.7 LA01/2018/0995/DC
Portrush Block Yard, 45 Craigahulliar Road, Portrush
Discharge of condition 5 of planning approval C/2013/0097/F
Discharged – 03.06.19

3.8 C/2013/0097/F

Portrush Blockyard, Craigahulliar Quarry, 45 Craigahulliar Road, Portrush, Co. Antrim, BT56 8NN.

Demolition of Existing Sheds. Proposed Caravan Park including Sites for 51 no. Touring Caravans, 49 no. Static Caravans, 18 no. Camping Cabins, Manager's and Amenity Caravans, Access Roads and Landscaping. Improvement of Ballymacrea Road (including new public footpath) to improve site access and carriageway improvements at No's 39, 90m west of 59d, 59c /59g and 67 Ballymacrea Road, and at the Ballymacrea/Ballybogey Roads Junction.

Approved – 28.09.17

4.0 THE APPLICATION

- 4.1 Extension of existing holiday park including design amendments to part of previously approved holiday park layout (approved under planning permission C/2013/0097/F).

Demolition of former Production Building and associated landscaping. Temporary foul cesspool (pending connection to public foul sewer

Proposal of Application Notice

- 4.2 As this application is considered a major application, it must comply with the Proposal of Application Notice and carry out community consultation at least 12 weeks prior to the submission of the application.
- 4.3 A Proposal of Application Notice was received on the 10th February 2023 under application LA01/2023/0126/PAN. The Applicant advised that they intended to undertake the following forms of consultation:
- Proposed Public Event on 29th March 2023 between (3 - 8pm) at Magherabuoy House Hotel, 41 Magherabuoy Road, Portrush, BT56 8NX.
 - The Public Event will be advertised in the Coleraine Chronicle and by letter drop.
 - Letters with information on the consultation event will be distributed to identified properties within a 100m radius of the site.

- Feedback will be able to be given through email, post and telephone.
- Elected members for the Causeway District Electoral Area will be given a copy of the Proposal of Application Notice.

Community Consultation Report

- 4.4 The community consultation report was submitted as part of the planning application, received on 24th October 2023 which is more than 12 weeks after the Proposal of Application Notice was received, as required by the legislation. The community consultation report demonstrates how the design of the proposal has been developed and evolved as part of the community and stakeholder engagement exercise. The report demonstrates that consultation was implemented as agreed in the Proposal of Application Notice.
- 4.5 The Public Consultation Event occurred on 29th March 2023 at Magherabuoy House Hotel. It was advertised in the Coleraine Chronicle on 23rd March 2023. A leaflet containing details of the public consultation event was designed and distributed to properties on Ballymacrea Road, Craigahulliar Road and Skerry View listed on the PAN form. This included residential properties and an adjoining landfill and NI Water facility. The associated architect for a further house under construction on Ballymacrea Road with no letter box was also notified. Two people attended the event. One individual was indicated to have been notified from the letter drop with the other attending an event in the hotel where the consultation event was taking place. Both are indicated to have signed the attendance sheet. The attendees were invited to complete the feedback form on the day or forward by post by 12th April 2023.
- 4.6 The consultation information outlines the agent contact details in the form of an address, email address and telephone number to contact for feedback.
- 4.7 Paragraphs 3.5 – 3.7 in the PACC document outlines that one feedback form was received by post which raised:
- Content with the proposed enlargement of the caravan site
 - Had attended the event at the Magherabuoy Hotel and brought to attention thorns on the side of the lane are

covered by ivy which should be taken out before a new fence is put up.

- 4.8 The PACC document concludes that the matters raised will be fully addressed by the project design team in the plans and reports submitted with the planning application.

Design & Access Statement

- 4.9 A Design & Access Statement is required under Article 6 of the Planning (General Development Procedure) Order (NI) 2015 as the application is considered to be a major application. The Design & Access Statement provides details of the design principles and concepts that have been applied to the development and how issues relating to access to the development have been dealt with.
- 4.10 A Planning Design and Access Statement dated October 2023 was submitted in support of this application. The contents of this document include Introduction, Existing Site and Surroundings, Policy Context, Layout Design, Landscaping, Access, Services and Conclusion. This Document explains the design considerations for the project such as:
- Organic layout comprising informal clusters of caravans defined and enclosed by conserved hedging, scrub, trees and groups of new native tree planting.
 - Vehicular access by a new roadway link from the existing holiday park network to an old quarry road which runs close to the western and southern site boundaries, rising to the upper level.
 - Road lines will curve and weave around new groups of trees to avoid a formal or linear arrangement of caravans.
 - At no point will more than a few caravans be visible until the vista is broken by a curve in the road or blocked by vegetation.
 - Concrete caravan pitches will incorporate space for off-road car parking configured in an inform arrangement. Static caravans will be orientated generally to face inwards towards the roadway.
 - Caravans will be set back from the boundary and this buffer zone will be planted with native trees and shrubs to strengthen the edge of the woodland and scrub.

- The site is enclosed within a mature setting, screened by existing topography and vegetation which will be conserved and augmented with additional planting.
- 4.11 The Applicant has undertaken detailed consideration of the proposal in terms of the design principles and concepts, access requirements and the impact on the character of the immediate context.

Environmental Impact Assessment

- 4.12 This proposal was subject to an environmental impact assessment screening as highlighted by, The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.
- 4.13 Permanent camp sites and caravan sites falls under Category 12(e) of Schedule 2 of the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017 with consideration of developments which has an area exceeding 1ha. The proposal has an application site area of 2.57ha. The site is partially within a 'sensitive area' namely Craigahulliar ASSI and screening is required with regard to both this and column 1 of Schedule 2. The Council is obliged under Regulation 12 of the Planning (EIA) Regulations (NI) 2017 to make a determination as to whether the planning application should be accompanied by an Environmental Statement.
- 4.14 Having considered the Regulations, the development proposal would not be likely to have significant effects on the environment and the submission of an Environmental Statement is not required. The EIA determination was carried out on 9th February 2026.

5.0 PUBLICITY & CONSULTATIONS

- 5.1 **External:**
2 objection letters have been received from one objector in relation to this application. The main issues raised are summarised below and will be considered and assessed in the remainder of this report:

- Adjoin a 130m boundary with the application site and was not notified of the PAN or the subsequent planning application.
- As was not notified of the PAN was unable to attend the consultation and make representations that should/could have been taken into consideration prior to the preparing and submission of the current application.
- PAN and application are both invalid and should be rejected.
- Proposed access/egress is within a few metres of their agricultural ground and has been abandoned for many decades and has only recently been upgraded/widened without the benefit of planning permission evidenced by Spatial NI aerial imagery available.
- The limited use of the access for its upgrading/widening and the import of materials has disturbed their adjacent livestock and the proposed substantial intensification of use has the potential to cause a major and sustained disturbance to their adjacent livestock.
- An abandoned, partially collapsed mine (possibly bauxite/lignite) is located adjacent to/under the proposed access which runs diagonally across the application site. This collapse may have been caused by recent reuse of the lane by heavy plant or the reason it was abandoned initially.
- The collapsed mine has been notified to and confirmed as such by GSNI. The mine crosses from townland of Craigahulliar towards Ballycraig Upper and has a history of collapse. The most major collapse of which they are aware created a 20' x 24' sinkhole and such a recurrence could be a danger to life.
- Original holiday park was subject to Judicial Review and during the assessment of this review the applicant gave commitments that they would not extend the site under consideration up the hill side. This application would breach this commitment.

5.2 Internal:

DFI Roads (No objections)

DFI Rivers (No objections)

Environmental Health (No objections)

Historic Environment Division: Historic Monuments (No objections)

DAERA: Water Management Unit (No objections)

DAERA: Regulation Unit Land and Groundwater Team (No objections)

DAERA: Natural Environment Division (No objection)

Shared Environmental Services (No objection)

DfE Geological Survey (GSNI) (No objection)

6.0 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:
- 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) is a material consideration. As set out in the SPPS, until such times as a new local plan strategy is adopted, councils will apply specified retained operational policies.
- 6.5 Due weight should be given to the relevant policies in the development plan.

- 6.6 All material considerations and any policy conflicts are identified in the “Considerations and Assessment” section of the report.

7.0 RELEVANT POLICIES & GUIDANCE

The Northern Area Plan 2016

The Strategic Planning Policy Statement Edition 2 (SPPS Ed 2)

Planning Policy Statement 2 (PPS 2): Natural Heritage

Planning Policy Statement 3 (PPS 3): Access, Movement and Parking

Planning Policy Statement 6 (PPS 6): Planning, Archaeology and the Built Heritage

Planning Policy Statement 11 (PPS 11): Planning and Waste Management

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

Planning Policy Statement 16 (PPS 16) – Tourism

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

Supplementary Planning Guidance

Development Control Advice Note 15 Vehicular Access Standards

Parking Standards

8.0 CONSIDERATIONS & ASSESSMENT

- 8.1 The proposal must be considered having regard to the NAP 2016, SPPS, PPS policy documents and supplementary planning guidance specified above. The main considerations in

the determination of this application relate to: Background to Application; Principle of Development; Design, Integration and Rural Character, Access, Movement and Parking, Built Heritage, Natural Heritage, Drainage and Flood Risk, Land Stability, Proximity to Waste Management Facilities, Sewerage, Contamination, Amenity and Other Matters.

Principle of Development

- 8.2 The proposed development seeks the extension to an existing holiday. Given the site is located within the countryside outside any designed settlement limit, Policy CTY 1 of PPS 21 is relevant. Policy CTY 1 of PPS 21 permits non-residential development in the Countryside for tourism use in accordance with PPS 16.
- 8.3 Planning permission will be granted under Policy TSM 6 for an extended holiday park where it is demonstrated that the proposal will create a high quality and sustainable form of tourism development. Policy TSM 6 and 7 directs to consider the matters of design and access, visual amenity, integration, rural character, landscaping and open space provision, impacts on archaeology, built heritage and natural heritage and emissions/effluents and sewerage arrangements.

Design, Integration and Rural Character

- 8.4 The site is located on lands to the south of the existing Craigahulliar Holiday Park located to the east of Craigahulliar Road and the south of Ballymacrea Road. The site is accessed from Ballymacrea Road and shares this access point with Craigahulliar Landfill site which has an access running to the east of the site south towards the landfill site.
- 8.5 The proposal seeks an extension to the existing holiday park with 9no. static caravans proposed to the south of the existing holiday park site to replace an existing building on the site. A further access which was used by the former quarry on the site is to be used which rises, extending south before turning north to a higher area of the site where further static caravans are to be located. This access benefits from existing mature planting located along its western extent. The eastern extent of this access comprises a slope rising up from the access to the east

to where the static caravans are to be developed. A total of 26no static caravans are to be developed at the higher portion of the site to include 16no single units and 10no twin units. These units are connected via a new road which meanders from Unit 3 north to Units 19 and 22. The land falls from this area towards Units 23 – 26 which are elevated above Units 27 – 35 at the lower portion of the site to the northwest. To the north of Unit 19 is a viewing point on an existing mound which is the highest point of the application site and was previously approved under a previous application C/2013/0097/F.

- 8.6 Both the single and twin type units proposed are single storey. The twin units are larger caravan units providing a greater level of accommodation.
- 8.7 The single type units have aluminium or composite cladding walls, coated steel, dark grey roofs, uPVC doors, rainwater goods and windows. The decking is uPVC with wood effect deckboards.
- 8.8 The twin type units have canexel cladding in natural sierra (natural wood tones), coated steel roof tiles in dark charcoal grey and black uPVC windows, doors and rainwater goods.
- 8.9 There are no ancillary buildings, areas of outdoor storage or public art proposed. The location does not extinguish or constraint any planning public access to the coastline or a tourism asset.
- 8.10 The proposed extension includes development of pitches to provide for caravans, internal roads and other ancillary structures e.g. fencing. The proposal does not include any proposed buildings. Assessment as to integration and rural character falls under Policy CTY 1 of PPS 21 and Paragraph 6.70 of the SPPS. There are further requirements in relation to visual amenity and rural character, design and open space provision under Policies TSM 6 and TSM 7.
- 8.11 Policy TSM 6 of PPS 16 requires adequate provision, normally around 15% of the site to be made for communal open space.
- 8.12 The proposal is an extension to an existing holiday park and there are existing facilities within the holiday park which are

able for utilisation by users to include a MUGA pitch and Games hut further to the northeast.

- 8.13 The layout of the caravan pitches is in an informal arrangement. The units at the lower level have a layout similar to that found in the existing caravan park. At the higher level of the site, the units are based primarily around a meandering road. The units are set between areas of grass planting with larger areas of open space found to the sides and rears of the proposed units.
- 8.14 The proposal seeks to also utilise the adjoining areas to the access road linking the lower and higher parts of the site for recreation purposes with areas of open space and sitting around areas indicated. The highest point of the site is also sought to be utilised for a viewing point as previously approved.
- 8.15 The application site overall is 2.57ha. Some of this area relates to the existing holiday park and its internal access roads. Excluding these roads and based on the area to their south the site area is 2.33ha.
- 8.16 The site layout includes small areas of open space between most of the caravan units which is appropriate for creating an informal arrangement but is not appropriate for communal use given the impact on the occupiers amenity.
- 8.17 The larger dedicated areas of open space to the rear of Units 1 – 2, Units 20 – 22 and Units 32 – 35 as well as usable areas on the access road and the viewing platform result in a total of 2729.1sqm (0.27ha) of open space which is 11.6% of the site area.
- 8.18 This communal open space provision is provided as an integral part of the development and the amount of space indicated is considered to be acceptable despite being below the normally around 15% figure outlined in the policy.
- 8.19 The communal open space requirement is based on the site area. In the case of this proposal, a large portion of the site is the access road and areas of planting. Excluding the landscaped bank separating the access road from the lower part of the site and the higher point of the site reduces the site area by 0.4ha. With this area removed, the site has 14% of the

site area as communal open space. The proposal has a significant landscaping scheme which provides amenity value on the site. Considering the extent of landscaping as part of the site area the communal open space indicated is acceptable.

- 8.20 The proposal benefits from the extensive landscaping present on the site. There are limited views of the access road linking the lower part of the site to the higher part due to the extensive planting present along the southern and western boundary of the site. This planting is to be mostly retained with new supplementary tree and shrub planting and 2.5 metre approx mesh fencing in RAL 6005 green. The finishes of this fencing will allow it to integrate with the existing planting.
- 8.21 The banks to the east of this access road are also heavily vegetated up until the high point of the site. This area provides some screening for the higher point of the site. This area is also to be retained with supplementary tree and shrub planting.
- 8.22 The proposal seeks to retain existing mounding present at the top of the banks to provide further screening. Further tree planting is proposed at the this highest point in the area of the proposed caravans.
- 8.23 The eastern boundary of the higher point has limited planting with a 2.4 metre high acoustic barrier proposed along the length of the eastern boundary from the entrance to the viewing point at the north to the access point descending to the south.
- 8.24 The viewing point is set within the existing scrub and is the highest point of the site.
- 8.25 The four twin units (23 – 26) sit above the existing holiday park. There are areas of planting proposed between these units with reliance on planting of the banks, the backdrop to the east and a reduction in the levels of this area for integration.
- 8.26 The proposed units at the lower part of the site are within the existing holiday park site and the proposal involves replacing the large building on site with 9no. units. These units adjoin the existing holiday park to the west, north and east with the southern boundary existing. Further planting is proposed to augment the southern boundary.

- 8.27 The critical views of the application site vary based on the area of the site. Due to the elevated nature of majority of the site, there are long distance views of the proposal as well as localised views.
- 8.28 The localised views of the site are primarily from Craigahulliar Road, Ballymacrea Road, the access road to the landfill site and the landfill site itself. There are more distant views from Corbally Road, Gateside Road, Ballywillan Road and Bushmills Road.
- 8.29 Long distance views of the site are primarily in context of the existing building on site to be demolished as a part of this proposal. This building is the largest building on the existing holiday park and is the visual focus with the scale of the caravan units on the site are considerably below that of this building. Other views of the site are in context of the netting associated with the landfill site.
- 8.30 Due to the short and long range views of the proposal, a visual assessment was requested and this was received in the form of photomontages for views from the most significant viewpoints on Corbally Road, Craigahulliar Road, Ballymacrea Road and Gateside Road.
- 8.31 With the longer distance views from Corbally Road, the photomontages indicate that there are views of the units at the higher points of the site. However, these views are not dissimilar to the views of the existing caravan apart from these same points. The nature of these views would be similar for that from Ballywillan Road and Bushmills Road, where possible. The landforms located between the application site and these partially assist in restricting views from these two roads. The photomontages indicate limited views of the site from Gateside Road. The views due to the scale of the caravans, extent of ancillary works and the existing and proposed landscaping, the proposal would not result in any unacceptable visual impact, would integrate appropriately and would not impact on rural character.
- 8.32 The short distance views indicate the site to be more prominent from Craigahulliar Road with views also possible from Ballymacrea Road.

- 8.33 Views from Craigahulliar Road consist of passing the existing site travelling south. Upon passing the existing site travelling south, the higher part of the site is viewed to the east for a brief period as the road runs almost parallel to the site. After a short distance upon reaching No. 39 Craigahulliar Road, the site is behind you.
- 8.34 The most significant views are the approach to the site along Craigahulliar Road from the crossroads with Corbally Road travelling north.
- 8.35 On this approach there are views of the higher portion and lower portion of the site. Views of the proposed units at the lower portion of the site do not result in any adverse visual impact with views similar to these proposed units at the existing units which are located closer to the road. The proposed landscaping arrangements will allow integration with no adverse impact on rural character. The access road is well screened behind the existing landscaping to be augmented and even in existing site conditions, views are limited given this planting and the setback from the road.
- 8.36 Units 23 – 26 are the most prominent units at this location on the photomontages given the elevated nature of this part of the site which is currently open. The Agent has proposed a reduction in levels of these units to assist in integration with views of these units in context of the backdrop of vegetation to the east. A colour palette has also been suggested; Sierra walls which is a natural wood type finish, black windows, doors and rainwater goods and a charcoal grey roof. Views will be possible of these units. However, they are considered to be integrated appropriately into the landform. With the landscaping arrangements also proposed, this will assist further in long term integration. Any visual impact from these units is not considered to adverse and rural character is not adversely harmed.
- 8.37 Views along this approach from Craigahulliar Road are also possible of the units at the higher portion of the site within the photomontages. The area of the viewing platform is also identifiable. These read as sitting within the vegetation at the higher points of the site on the photomontages and are not

completely visible. In this respect, the visual impact is lessened and the units integrate into the landform. There is no harm to rural character from these views.

- 8.38 Views from the site access at Ballymacrea Road are screened out by the existing vegetation at the site access in the photomontages. Travelling west past the site, the views from Ballymacrea Road are blocked by development at Skerry View and beyond this the views are behind you. Views from Ballymacrea Road travelling east are possible of the units at the higher point of the site and the area with the viewing platform which sit within the existing and proposed vegetation similar to that from Craigahulliar Road albeit at a further distance and with a wider backdrop. The visible units similarly read as integrated within the landscaping and there are no concerns in relation to rural character from views along this road.
- 8.39 As the proposal shares an access point with Craigahulliar landfill site, there are views along this road towards and into the landfill site. Most of the views along this road and from buildings along this road are of the existing caravan park with the lower part of the proposal located to the southwest beyond most of the other existing plots and the earth bank defining the eastern side of the site. On the approach to the landfill site and the road within there are views from the site across to the site. These views are separated by the landform which drops down from the site to a pond before rising up to the road at the landfill site. Along this boundary a 2.4 metre acoustic barrier fence is proposed with the both the gable and lengths of the single units located in close proximity to the boundary. The single units are indicated to have a height of 3.4 metres above ground level and are set back 3 metres from the boundary. The area within the landfill site is not considered to be an area of high visual amenity given the associated use and weighing the views of the fencing and upper parts of the static caravans with this matter in addition to the tree planting proposed which would assist in soften the development, there are no concerns in relation to visual impact, integration or rural character from this viewpoint in policy terms.
- 8.40 A Lighting Impact Assessment has been submitted with the proposal along with lighting reports indicating the layout and lighting specifications.

- 8.41 The lighting arrangements has been amended throughout the proposal due to change in layout and in relation to consultee comments, particularly from NIEA in relation to impact on natural heritage interests.
- 8.42 The current lighting arrangements comprise a total of 17 lights located along the access road. The mounting height of lights 1A, 2A, 3A, 4A, 5A, 7A, 8A, 12A and 13A has been restricted to 5m and all the lanterns are to be mounted at zero degree angle and fitted with rear louvres. Lights 6B, 9B, 10B, 11B, 14B, 15B, 16B and 17B comprise 1m tall bollards.
- 8.43 The Lighting Impact Assessment outlines that the optics selected gives close beam control on light output to ground level ensuring minimal light spill beyond the new access lane throughout the site. It states that the new lighting installation is in line with ILP Guidance for Reduction of Obtrusive Light (GN (01/21) for Environmental Zone E2, with no light levels above 1 lux on any trees or hedges west of the site and zero light on the Badger Buffer Zones. It is highlighted that these figures are the maximum light levels in theory across the site, The maximum projected light levels outlined in the Isolux Lighting Plot will be reduced by the physical presence of any new landscaping or fencing and by a further 25% from midnight to 7am each night due to dimming facility on lights 1A, 2A, 3A, 4A, 5A, 7A, 8A, 12A and 13A.
- 8.44 Environmental Zone E2 relates to a lighting area of low district brightness . ILP guidance indicates this zone to be reflective of sparsely inhabited rural areas, village or relatively dark outer suburban locations.
- 8.45 This Environmental Zone is reflective of the site context and there are no concerns with the lighting arrangements proposed with respect to detracting from landscape quality or the character of the area from light pollution.
- 8.46 Overall, the application site benefits from the extensive existing planting present on the site which is to be retained and augmented. This soft landscaping and the mounding screens most of the proposed cabins and the proposal has been designed with this in mind being reliant on this landscaping for

integration and to reduce visual impact. There are limited views of the other ancillary elements i.e. roads and fencing proposed with the exception of the views from the landfill site which are not unacceptable. The design of the proposal is appropriate for the site and locality and the site has the capacity to absorb the extension to the holiday park without adverse impact on visual amenity and rural character. The site layout, associated infrastructure and landscaping arrangements are of high quality and assist the promotion of sustainability and biodiversity. The use as an extension to the existing holiday park is compatible with surrounding land uses in principle with further consideration on amenity within this report. The built form will not detract from landscape quality and character of the surrounding area. Conditions are required for the implementation of the planting notes and retention of the existing planting.

Access, Movement and Parking

- 8.47 As an extension to a holiday park, the proposal is directly accessed through the existing holiday park. The proposal seeks to utilise the existing vehicular access onto Ballymacrea Road. This road is not a protected route.
- 8.48 The site layout indicates the utilisation of an existing laneway which was utilised as a part of the former quarry operations on the site.
- 8.49 An objection raises that works have been done to this laneway which would have required planning permission and that this is indicated on Spatial NI.
- 8.50 From review of Spatial NI, most of the existing laneway is not visible as it is obscured by the adjoining landscaping.
- 8.51 A review of Google Earth indicates the presence of an overgrown lane on imagery of April 2021. On the imagery of May 2018 this area is entirely overgrown.
- 8.52 Historic Ordnance Survey mapping on DfC Historic Map Viewer indicates the presence of a laneway associated with the former quarry works in this location in the 1950s. The site plan drawing indicates this access as part of the old quarry.

- 8.53 In any case, this access is indicated on the drawings and its usage in the arrangement indicated falls to be considered as a part of this proposal.
- 8.54 The Design & Access Statement outlines that there is sufficient capacity in the adjacent roads system to accommodate the anticipated flow of traffic. A Transport Assessment Form has been submitted which has ticked 'no' for all questions. The Design & Access Statement outlines that traffic is seasonal and mostly between March and October with maximum traffic use at weekends. Week days are outlined to be relatively quiet except for school holidays. Full occupancy is outlined to only generally occur during major events. The traffic is outlined to come and go throughout the day when the road network is quieter and there is little night-tight traffic associated with the caravan park. The expected traffic movements with the proposed extension is indicated to be 216 and staff car/small vans will be 20 per day for a total of 236 vehicle movements a day. There will be no operational increase in heavy goods vehicles or deliveries with there currently less than one delivery per day.
- 8.55 DFI Roads was consulted on the proposal and advised as the existing access geometry is acceptable, they have no objections to the proposal subject to informatives.
- 8.56 Further to the traffic assessment within the Design & Access Statement, application LA01/2024/0485/F was approved relating to retrospective permission for 14no. caravan pitches suitable for static caravans in lieu of 3no. approved static caravan pitches, 3no. approved touring caravan pitches and 8no. approved camping cabins. This is the same number of pitches overall with no change to the vehicle movement numbers.
- 8.57 Further amendments have been made to the internal road layout due to the requirement for changes to the site layout for biodiversity interests. The extent of the changes are not considered to require further consultation.
- 8.58 The site provides a movement pattern similar to that of the existing holiday park given it shares the same access. An existing cycle network passes the site and there are footpaths

in the surrounding residential area for walking. The site is a rural site and connectivity is limited by its location. The proposal respects existing public rights of way.

- 8.59 Having regard to the supporting information submitted and the response from DFI Rivers, the access to the public road was previously approved and meets Departmental guidance. The existing road network can safely handle any extra vehicular traffic the proposal will generate. The proposal satisfies the requirements of PPS 3.

Built Heritage

- 8.60 The Northern Area Plan 2016 indicates an Archaeological Site and Monument (Unscheduled) on the site.
- 8.61 Historic Environment Division: Historic Monuments was consulted on the proposal and advised that the recorded SMR site, an Early Medieval souterrain, is not precisely located but is recorded as being in a different townland to the present application site so will not be affected by this proposal.
- 8.62 Historic Environment Division: Historic Monuments further advised that the area subject to the extension to the caravan park appears to have undergone significant previous ground disturbance/quarrying works, which will have diminished the archaeological potential of this site. Consequently HED (Historic Monuments) advises that this proposal is acceptable to PPS 6 and SPPS archaeological policy requirements.
- 8.63 No further built heritage is located on or in close proximity to the site which would be adversely affected by the proposal.
- 8.64 The proposal satisfies the archaeological requirements of the SPPS and PPS 6.

Natural Heritage

- 8.65 A Preliminary Ecological Appraisal was submitted with the proposal which identifies impacts on biodiversity on site and designated sites.

- 8.66 The site adjoins and is partly within Craigahulliar ASSI which is located to the southeast of the site. Craigahulliar ASSI is designated for its special features of geological interest.
- 8.67 NIEA Natural Environment Division were consulted on the proposal and advised that although Craigahulliar ASSI overlaps the boundary that the Site Layout and Landscape Plan indicates the proposed development to be outside the adjoining boundary.
- 8.68 NED advise that provided that no construction activity including materials and spoil storage are within the designated area, NED is content there will be no significant impacts to Craigahulliar ASSI by the proposed development. NED highlight that the designated area shall not be disturbed in any way and have recommended a condition to confine all construction activity and materials (including spoil) within site boundaries, and that Craigahulliar ASSI designated area shall not be disturbed in any way without written consent from Northern Ireland Environment Agency.
- 8.69 NED notes from the Flood Risk and Drainage Assessment that the drainage at the site will connect to an existing layout which discharges into an undesignated watercourse to the north of the site which is hydrologically connected to the Skerries and Causeway SPA. NED recommend appropriate pollution prevention measures and adherence to pollution prevention guidance (PPGs) are implemented during construction to avoid any potential impacts to the designated sites downstream of the discharge outlet.
- 8.70 Shared Environmental Services was consulted on the proposal and advised that following an appropriate assessment in accordance with the Regulations and having considered the nature, scale, timing, duration and location of the project, SES advises the project would not have an adverse effect on the integrity of any European site either alone or in combination with other plans or projects with mitigation measures proposed in the form of a condition. This condition relates to provision of a suitable buffer of at least 10m must be maintained between the location any refuelling, storage of oil/fuel, concrete mixing and washing areas, storage of machinery/material/spoil etc. and any

surface drains present onsite or adjacent to the site. With adherence to this condition, the proposal would not result in any impact on European designated sites.

- 8.71 Within the PEA an extended Phase 2 Habitat Survey was indicated to have been undertaken. This identified the need for retaining areas of open mosaic habitat where the overall design allows with additional tree planting and habitat enhancement proposed to include enhancement of woodland edges and scrub woodland areas to ensure succession and regeneration.
- 8.72 Birds were recorded on site visits and the proposal will not impact boundary hedge lines and tree planting but will impact on open mosaic areas. All boundary vegetation has been advised to be protected, native woodland species planted and structural diversity along wooded edges enhanced to create additional nesting for birds.
- 8.73 Badger setts were identified on the site at three locations within wooded scrub and banks to the west, southwest and south of the site. These setts are indicated to be protected with a badger gate proposed and setts closed during construction phase subject to license.
- 8.74 No open water is indicated within the redline boundary with a lake to the east of the site which will not be impacted.
- 8.75 A Preliminary Roost Assessment identified the warehouse on site to be demolished to be negligible bat roost potential with no further bat survey required.
- 8.76 A Tree Survey was carried out with 34 trees identified. These trees are located primarily to the west and south of the site and are associated with the land adjoining the access and site boundaries. Two further trees are located at the high point of the site. One tree, a sycamore in poor condition is recommended to be felled.
- 8.77 NIEA NED provided comment on protected habitats and species and raised concerns requesting further information to include assessment of bat roost potential on three trees listed in the survey report, an amended lighting plan to avoid artificial light disturbance on trees and hedgerows to the west of the site,

updated badger surveys and 25m radius around them, an updated phase 1 habitat plan and further clarifications on mitigation and compensation on habitat loss.

- 8.78 Further to this response, an amended site layout was submitted in part to address the impact on the locations of the badger setts along with an addendum to the PEA originally submitted.
- 8.79 The PEA addendum outlines no change to birds and habitats from previous surveys with no further surveys required. No significant change to badgers from original surveys was noted with two setts appearing to be active and the third not active but tracks noted at the hole. The amended site plan includes 25m buffer zones around each sett with no further surveys required. No change was noted to Fish, Smooth Newt, Lizard and Common Frog from previous surveys with no further surveys required. No changes were noted in bat roost potential (BRP) of site from previous surveys with no further surveys required. Assessment of the three trees requested by NIEA had a negligible bat roost potential. The landscaping plan was amended to include habitat management notes with compensation and mitigation included.
- 8.80 Details of the updated Lighting Plan are highlighted at paragraph 8.40 – 8.44 of the PC report.
- 8.81 NIEA NED was re-consulted on this information and advised that they are satisfied that Tree 21 was assessed as possessing a Bat Roost Potential of 'negligible' and no further surveys are required. On review of the Site Layout and Landscape Plan and Lighting Report, NED is satisfied that a buffer of 25m will be maintained around all identified sett entrances with no works, including lighting, to be carried out within the buffer zones. NED note the intention for all lengths of existing access road within the buffer zones to be 'as existing within badger zone'. NED also highlight that buffer areas have already been demarcated on site, as shown within Addendum 2. All buffer zones should be maintained and adhered to for the entirety of the construction phase. NED accept the determination of Open Mosaic Habitat on Previously Developed Land (OHMPDL) made by the surveying ecologist and are content with the proposed details contained within the Habitat Management Plan.

- 8.82 NED acknowledge the documents submitted in support of the application, and based on the information submitted, consider the proposal unlikely to significantly impact upon natural heritage features or Designated Site selection features subject to three conditions. These conditions relate to restrictions within Craighulliar ASSI and badger protection zones and the appointment of an Ecological Clerk of Works. These conditions should be applied on any approval.
- 8.83 Having regard to the above assessment and responses from NIEA NED and Shared Environmental Services the proposal is considered to be compliant with the requirements of PPS 2 subject to conditions.

Drainage and Flood Risk

- 8.84 A Flood Risk & Drainage Assessment was submitted with the proposal which identifies a settlement pond on adjoining land. No watercourses were indicated to be identified. A review of DFI Rivers Flood Maps is outlined to indicate no flooding on the site.
- 8.85 The Flood Risk & Drainage Assessment outlines the discharge of storm water from the proposed extension to an undesignated watercourse to the north of the site which is associated with the existing holiday park and for which Schedule 6 consent currently exists. It is outlined that this consent does not require alteration as the discharge from the site will not exceed the consent.
- 8.86 The Flood Risk & Drainage Assessment outlines that the proposed surface water drainage will be maintained by the Applicant and adoption by NI Water or any other body is not proposed.
- 8.87 JKB Consulting outline that the drainage design meets relevant design standards and that adequate measures will be put in place to effectively mitigate the flood risk to the proposed development and from the development elsewhere.
- 8.88 JKB Consulting also confirm that no properties would be inundated as a result of the exceedance from the development

and that the current and existing flow paths would be unchanged as a result of the proposed development.

- 8.89 DFI Rivers was consulted on the proposal and advised that the proposal does not lie within the 1 in 100 year fluvial or 1 in 200 year coastal flood plain.
- 8.90 DFI Rivers advise that there are no watercourses which are designated under the Drainage (NI) Order 1973 and that an undesignated culverted watercourse traverses the existing access into the site. Previous comments under LA01/2022/0080/F are indicated to remain relevant.
- 8.91 DFI Rivers advise they have reviewed the Drainage Assessment and that it provides a detailed drainage design that demonstrates that the issue of out of sewer flooding will be managed by attenuating the 1 in 100 year event with an additional allowance for climate change (20%) within the proposed drainage network and safely disposed of at limited rate supported by relevant correspondence from Rivers Directorate/NIW. DFI Rivers advise that if this was achieved it would satisfy the requirement under PPS 15, FLD 3 to provide adequate measures to mitigate the flood risk from the development to elsewhere.
- 8.92 DFI Rivers advise that the Applicant is responsible for the design, construction and maintenance of the drainage network and managing the associated flood risk. DFI Rivers advises compliance with the drainage assessment is included in any planning decision.
- 8.93 DFI Rivers advises while not being responsible for the preparation of the report, accepts its logic and has no reason to disagree with its conclusions. Consequently, DFI Rivers cannot sustain a reason to object to the proposed development from a drainage or flood risk perspective.
- 8.94 Policies FLD 4 and 5 are indicated to not be relevant to the proposal.
- 8.95 Having regard to the supporting information provided and the position of DFI Rivers, it is considered that the proposal would comply with the policy requirements of PPS 15. A condition

should be applied to ensure the design, construction and maintenance of the drainage network in accordance with the agreed Drainage Assessment.

Land Stability

- 8.96 The application site operated historically as a quarry which has involved.
- 8.97 GSNI was consulted on the proposal and advised that the proposed site contains abandoned mine workings (five recorded) and the majority of the footprint of the land falls within an area that requires a Mine Risk Assessment in the interests of public safety.
- 8.98 GSNI initially advised that they do not view the MRA that was submitted to be adequate that has considered the potential hazards associated with the development in an area of abandoned mines and demonstrated low risk.
- 8.99 Further information in the form of a Mine Risk Assessment was requested. It was outlined if the Applicant feels an exemption should be applied they should outline the reason and justification for this.
- 8.100 An exemption letter from Mason Evans Geo-Environmental Consultants was submitted by the Agent in support of an exemption. The letter raises that the drawings indicate that the proposed development site levels do not significantly change, confirming no significant ground works and that each caravan will be placed onto and above a concrete base using adjustable jack-type stands.
- 8.101 The letter also refers to the ground gas risk assessment submitted from Cove Environmental Consulting Ltd which concludes that the ground conditions below the site poses a very low risk. The caravans are outlined to be placed on a concrete base with open venting space between the concrete and caravan. On the basis of both these matters, they conclude that the ground gases pose no future human health risk for temporary caravan residents.

- 8.102 GSNI was consulted and advised that the proposed development is for non-permanent structures and involves limited groundworks. They advise that they are satisfied the public risk due to the development is negligible, that a Mine Risk Assessment is not required and they are content with the development as proposed.
- 8.103 An objection raises the presence of an abandoned partially collapsed mine under the proposed access, that GSNI have been notified of this and the risk to life from a recurrence of a collapse. Photographs were enclosed with the objection depicting a collapse.
- 8.104 GSNI were consulted on this objection and advised the abandoned mine working described was previously known and held on public report. They advise that the collapse was reported on 4th March (2023) and following a visit to the site it had been identified the mine entrance had been partially exposed and not collapsed. This is indicated to be likely due to a minor slippage of the slope due to rainfall and/or through land clearance works which were evident.
- 8.105 GSNI advise the mine working was noted as being backfilled, as previously recorded in their records. No compromise to the structural integrity of the mine was evident and no access is possible due to the backfill.
- 8.106 GSNI advise they do not hold any records of mine collapses at the location under application and none have been identified through the mine monitoring programme.
- 8.107 GSNI advise that the photographs submitted within the objection are from a collapse at the Urbalreagh iron ore mine in 2006 located approximately 1.5km east of the mine workings at Craigahulliar, on the Ballyholme Road.
- 8.108 Further amendments to the scheme to address visual impact concerns have resulted in an amended layout and further reduced site levels at the site area around Units 23 – 26 and their associated access road.
- 8.109 Accompanying letters from the Agent's geo-technical engineer outline that the north-western site area is proposed to be

reduced by a maximum of 2.4m and the requirement for a MRA has been reviewed. Trial pits excavated were recorded to >2m made of ground described as broken bedrock (quarry) material. They advise following their site visit and considering the existing topography, it can be concluded that similar, very thick, made ground materials will exist below the north-western site area. Their view is that removal of limited and localised relatively shallow made ground material does not constitute significant earthworks and will not increase future risk from deep historical mining activities.

- 8.110 GSNI was consulted and acknowledged the reduction in ground levels by up to 2.4 metres and ground investigations of the north-west portion of the site in the form of trial pits and requested further information from the investigations.
- 8.111 A further letter from the geo-technical engineer outlines that mine adit 116 was historically relatively shallow and considered to be 4.5m below the proposed reduced ground level. The trial pits confirm that the proposed extension area is underlain by thick made ground soils and investigation for the aforementioned mine adit could not locate it. The letter concludes that prior to raising the site levels, the shallow mine adit was most likely located, exposed, excavated out and infilled which is why it could not be located. The mine adit is outlined to no longer exist and the proposed minimal ground level reduction will not pose a future risk to ground stability.
- 8.112 GSNI advised they were content with the proposal on the basis of the information available.
- 8.113 On the basis of the supporting information and consultee considerations, there are no concerns in relation to health and safety from former mine workings on the application site.

Proximity to Waste Management Facilities

- 8.114 The application site is located to the northwest of Craigahulliar Landfill site which is now closed. The site has planning permission under LA01/2024/1187/F for the use of the existing waste transfer station to allow for storage and transfer of dry recyclables and mixed municipal wastes due to the closure of the existing landfill site.

- 8.115 There is potential for the impact on residents within the proposed holiday park extension from odour generated from the landfill site operations.
- 8.116 The proposal falls to be considered under Policy WM 5 which relates to development in the vicinity of Waste Management Facilities. Such development is only to be permitted where it will not prejudice or unduly restrict activities permitted to be carried out within the waste management facility and it will not give rise to unacceptable adverse impacts in terms of people, transportation systems or the environment.
- 8.117 The Air Quality Assessment submitted with this application highlights that overall air quality impact of the development is considered to be not significant. In relation to impacts from the landfill site, some very faint odours were experienced close to the landfill site to the south of the proposed development with a negligible effect. No landfill odours were noted to the north and east of the proposed development. It is concluded that site users of the proposed development are unlikely to experience a significant odour impact from Craigahulliar landfill.
- 8.118 Environmental Health was consulted on this document and advised that the Craigaulliar Landfill Site is located to the east of the proposed development site and is regulated by the DAERA Regulation Unit as per the Pollution Prevention and Control (Industrial Emissions) Regulations (NI) 2013 (Permit No. PO148/06A).
- 8.119 Environmental Health continue that the facility is an engineered landfill with associated landfill gas being managed by active extraction and burned in a gas engine to generate electricity. Environmental Health note the Air Quality Assessment and as DAERA are the primary regulators in this instance, the Planning Department should seek commentary in relation to the above-mentioned AQA and potential air quality and odour impacts associated with operation of the Craigaulliar landfill on the proposed development from the primary regulator.
- 8.120 NIEA Regulation Unit advise that the landfill has ceased waste acceptance and is in the closed / aftercare phase, operating in accordance with its permit and associated closure and

monitoring requirements. The PPC permit for Craigahulliar landfill includes conditions governing landfill gas management and monitoring, leachate and groundwater control, surface water management, and post-closure environmental monitoring and reporting. These controls are specifically designed to prevent adverse impacts on off-site receptors, including neighbouring land uses, when the site is operated in compliance with the permit.

- 8.121 NIEA Regulation Unit advise that based on the PPC regulator's remit, and on the basis that the landfill continues to operate in compliance with its permit conditions, NIEA does not identify any specific pollution prevention or control issues arising from the landfill that would preclude the proposed development. Ongoing compliance with the landfill permit is intended to ensure that emissions to land, water and air are adequately controlled and monitored.
- 8.122 The response from NIEA Regulation Unit highlights that the landfill site is operating within its permit conditions and that that there are no pollution prevention or control issues that would preclude the proposed development. The response indicates the landfill site would not cause adverse impacts on the proposal.
- 8.123 This proposal relates to an extension to an existing holiday park already in close proximity to the landfill site. No concerns have been raised by NIEA Regulation Unit in relation to the extension operating in close proximity to the landfill site or in terms of restricting the operations of the landfill site in accordance with its permits.

Water Supply and Sewerage

- 8.124 The submitted P1 form indicates the proposed usage of mains water supply and foul sewerage. A drainage plan has been submitted in relation to surface water disposal and is considered under the Drainage and Flood Risk section.
- 8.125 NI Water was consulted on the proposal and advised that there is an available public water main which can adequately service the proposal.

- 8.126 In relation to foul sewerage, NI Water advise of capacity in the Waste Water Treatment Works but the public foul sewer cannot adequately service the proposal as it has reached capacity.
- 8.127 NI Water advise of public sewers traversing the site and requested conditions to prevent disturbance/damage to existing sewers and in the interest of public safety.
- 8.128 The Agent has advised that a sewer connection was approved for the original holiday park and infrastructure charges paid by the Applicant associated with this.
- 8.129 NI Water was re-consulted on this information and advised that a waste water impact assessment is required as the proposal represents an increase in discharge and is affected by 2 Unsatisfactory Intermittent Discharges which are operating too frequently and of impacts of sewer flooding into the environment.
- 8.130 An amended proposal has been submitted which incorporates a temporary foul cesspool to address the lack of mains sewerage availability.
- 8.131 NI Water was re-consulted and recommended approval advising that any private treatment must be approved by NIEA and that they strongly advise liaising with NIEA prior to granting planning to ensure that is an achievable option.
- 8.132 NIEA Water Management Unit was consulted and noted the intention to install a cesspool/holding tank to deal as a temporary measure pending connection to the public foul system. They advise that the proposed cesspool/underground tank to collection sewage effluent/runoff must be watertight with no outlet or leaks and that any overflow leak from such a tank may constitute a pollution event which is an offence. They advise the tank must be emptied regularly by a registered waste carrier and they recommend the installation of a level warning device.
- 8.133 NIEA Water Management Unit advise they are content subject to conditions, relevant statutory permissions being obtained and the Applicant referring and adhering to DAERA Standing Advice.

- 8.134 Having regard to the above consideration that the proposal would have an adequate means of water supply and foul sewerage disposal in the arrangement proposed.
- 8.135 A condition should be applied to ensure the development of the temporary cesspool pending a future mains sewage connection and its future decommissioning.

Contamination

- 8.136 Given the former quarrying operations on the site and the location in close proximity to the landfill site there is potential for site contamination.
- 8.137 A General Quantitative Risk Assessment was submitted with the application.
- 8.138 The GQRA raises the remediation of the site under Phase 1 associated with the existing holiday park site. This area was formerly a concrete products manufacturing plant. Inspections of remediation were carried out under application LA01/2022/0080/F and previous discharge of condition application LA01/2018/0995/DC.
- 8.139 In relation to the application site, the GQRA outlines that the levels of soil contaminants were all detected below the relevant human health guideline values and there is nothing that would be considered a risk to human health. It is raised that slightly elevated levels of lead were found in a single sample which is not considered to be a significant risk. Levels of gas generation within the ground places the site in the very low risk category with no gas protection required for any buildings. The phenol and sulphate levels were below appropriate WRAS levels and are considered to be no risk to fabric of buildings or services proposed. No groundwater was indicated to be present within the shallow soils below the proposed development area and there is no significant movement of groundwater contaminants and the potential for transfer of contaminants to ground water, surface water or third party sites is deemed insignificant.
- 8.140 The GQRA considers that no remedial measures are required for the development as proposed. Recommendations are made

for any ground conditions identified at variance with the report and for off-site material disposal.

- 8.141 DAERA: Regulation Unit (RU) (Land and Groundwater Team) was consulted and advised that they have reviewed the GQRA as well as the Mining Risk Assessment and no unacceptable risks to environmental receptors have been identified for the development. Regulation Unit and Groundwater Team advise they have no objections to the development provided conditions and informatives are placed on any decision notice as recommended. These conditions relate to processes if new contamination or risk are identified.
- 8.142 A further condition was requested to state that the proposal shall not be occupied until remediation under the remediation strategy of C/2013/0097/F have been fully implemented. This matter is beyond the scope of this application to be conditioned.
- 8.143 Environmental Health has reviewed the GQRA and advised that as no remediation measures were deemed necessary that they recommend inclusion of conditions should permission be granted. These conditions relate to processes if new contamination or risk are identified.
- 8.144 The response from consultees raises no objections subject to conditions. With adherence to these conditions, the proposal would not result in any harm from any contamination.

Amenity

Noise Impact

- 8.145 The proposal is located in close proximity to a number of residential receptors and has the potential to detrimentally impact on their residential amenity. These receptors are mostly located along Ballymacrea Road, Craigahulliar Road and Skerry View.
- 8.146 A Noise Impact Assessment by RSK Ireland was submitted with the proposal which highlights that the nearest residential receptor is located over 150 metres from the proposed site and it is unlikely that residents will be significantly affected during construction. The maximum amount of additional vehicle

movements within the park and the surrounding road network is an approximate increase of 1.2dB within the holiday park and less than this on the surrounding road network. It is highlighted that there are no proposed entertainment or recreational events in relation to this project and it is unlikely that normal camp site related activities and voices will be perceptible at residential receptors. The site is indicated to have a quiet time between 11pm – 8am with a helpline to report anti-social behaviour and/or noise level complains. Excessive noise is highlighted to not be tolerated on site and these conditions are anticipated to be adhered in the proposed extension.

- 8.147 The Noise Impact Assessment concludes that the project will result in a neutral, not significant, permanent effect. To further reduce the likelihood of noise from the neighbouring landfill site adversely impacting upon the holiday park occupants an acoustic fence is included on the plans to the east of the site which is proposed to be at least 200 metres in length to a height of 2.4 metres, a surface mass of at least 12kg/m² with no gaps or perforations.
- 8.148 Further to the submission of the Noise Impact Assessment, the site layout was updated and planning approval was granted for the conversion of a former workshop to a dwelling under LA01/2023/0417/F. A further application for the conversion of a former blacksmiths forge under LA01/2023/0418/F is under consideration. Both conversion applications share a vehicular access with the holiday park and are located on the access road to the landfill site which is located directly to the east of the application and consequently in close proximity to the holiday park use.
- 8.149 A further letter was sent from RSK Ireland to consider the revised layout and the impact on these two receptors. Details of the construction phase (including anticipated plant to be used) have been reviewed and calculations have shown that noise levels at the closest receptors during construction are likely to be well below the 'ABC Method' significance criteria. Due to the anticipated plant to be used and the distances involved, vibration levels at the closest receptors are expected to be comfortably below the significance criteria for human perception.

- 8.150 The letter indicates that details of the potential operational noise impact have been reviewed, and it is considered that the operational noise impact of the proposed development at the closest receptors will be negligible and not significant. The amended layout and the approval of the 2 no. additional dwellings will not change the conclusions of the Noise Impact Assessment as previously submitted.
- 8.151 Environmental Health was consulted and advised that Section 4.1 of the NIA specified 4 No. monitoring locations where the baseline noise survey had been carried out. These subsequent locations were chosen due to their proximity to nearby noise sensitive locations, roads and potential sources of noise. In terms of the baseline noise survey, the dominate sources of noise were identified as being derived from road traffic, bird song and the adjacent landfill site.
- 8.152 Environmental Health advise that assessment of noise levels emanating from the landfill site when operational do not appear to have been assessed against prevailing background levels at the proposed development site. However, noise levels emanating from the extant landfill site and gas flare stack were recorded as being below the recommended WHO guideline values.
- 8.153 Environmental Health note the installation of an acoustic barrier to be sited at the eastern boundary of the development site location situated directly opposite said landfill site, that there will be no proposed entertainment or recreational events operated within the confines of the development proposal, and no new items of plant installed at the development site location. Impacts from the additional road traffic movements are noted.
- 8.154 Environmental Health note the current operating procedures of the holiday park and recommend the development of a noise management (NMP) plan in order that any potential noise associated with the development proposal be reasonably controlled, and the amenity of neighbouring residents protected. It is recommended that this be considered as a condition on any approval.

- 8.155 Environmental Health highlight that it has not been in receipt of noise complaint in relation to the operation of the existing holiday park facilities.
- 8.156 Environmental Health recommend conditions should approval be granted. These conditions relate to the restriction on vehicle movements and live entertainment/recreational events, development of the acoustic barrier and any future noise complaints.
- 8.157 Further consultation was carried out on the further RSK Letter with Environmental Health acknowledging the contents and advising that they are satisfied with the explanation provided within the correspondence and accept that the additional receptors do not materially change the conclusions of the original assessment. On this basis, Environmental Health has no further comments in relation to noise in respect of this update to the proposal.
- 8.158 Having regard to the supporting information received and the response from Environmental Health there are no concerns in relation to impact on adjoining residents from noise generated from the proposal.

Lighting assessment

- 8.159 Lighting arrangements are outlined at paragraph 8.40 – 8.44 of this report.
- 8.160 Environmental Health was consulted on the lighting arrangements proposed and initially requested detail on the lighting zone within which the development is located to ascertain whether maximum values of vertical Lux illuminance fall within the permissible parameters for the zone subsequently identified. This was later clarified by the lighting consultant to be E2 Environmental Zone (sparsely populated rural area) with vertical light parameters 5 lux pre-curfew and 1 lux post-curfew.
- 8.161 Environmental Health was consulted on the most recent lighting scheme and have advised that they are content subject to conditions. On this basis, there are no concerns in relation to the impact of lighting on residents subject to adherence to these conditions.

Other Matters

- 8.162 An objection has raised the lack of notification under the Pre-Application Notice and under this Planning Application and indicates this application to be invalid on this basis.
- 8.163 Section 41 of The Planning Act (NI) 2011 states that arrangements for giving notice of applications for planning permission may be provided in a development order. Article 8(1)(b) and 8(2) of the GDPO provides greater detail in relation to the notification requirements.

Identified occupier means the occupier of premises within a 90 metre radius of the boundary of the application site.

Neighbouring land means land which directly adjoins the application site or which would adjoin it but for an entry or a road less than 20m in width.

- 8.164 Where an application for planning permission is made to the council or, as may be the case, the Department, the relevant council or the Department is required to serve notice of the application to any identified occupier on neighbouring land in accordance with Article 8(2) of the GDPO.
- 8.165 Paragraph 4.10 of the Department for Infrastructure's Development Management Practice Note 14 Publicity Arrangements and Neighbour Notification states that the scheme extends only to occupiers on adjoining properties, it does not include landowners who do not occupy the site. In the case of adjoining land if there is no occupiable building eligible to receive neighbour notification then it cannot be carried out.
- 8.166 The requirements of the neighbour notification scheme in the planning regime is specified by the aforementioned legislation and the accompanying guidance in the Development Management Practice Note.
- 8.167 Similarly, there is no requirement for an applicant to notify landowners who do not occupy the site under pre-application community consultation arrangements.

- 8.168 The objector is not prejudiced as they are aware of the planning application and are afforded the opportunity to make comments on the application at this stage. Further re-notification has been carried out to the objector under this application.
- 8.169 Disturbance to adjoining livestock has been raised by the objector from works carried out on site and significant intensification of the use proposed.
- 8.170 Policy TSM 7 requires that all tourism development is compatible with surrounding land uses. The policy remit under Policy TSM 6 of PPS 16 indicates that holiday parks are an acceptable form of development in the countryside and this is where livestock will be typically located. There is an existing holiday park approved and this proposal relates to an extension which is not considered to give rise to any harmful amenity concerns.
- 8.171 Application C/2013/0097/F was subject to Judicial Review and an objection raises that in these proceedings that commitments were given that they would not extend the site under consideration up the hill side and this application would breach this commitment.
- 8.172 The Council is required to consider any planning applications brought before it as a part of its statutory functions.

CONCLUSION

- 9.0 The proposal is considered acceptable at this location having regard to the Northern Area Plan 2016 and other material considerations. The principle of development for a holiday park was established under application C/2013/0097/F with two further applications approved to amend this layout under LA01/2022/0080/F and LA01/2024/0485/F. The proposed extension has been designed to utilise and integrate with the existing site conditions. The proposal satisfies policy requirements in relation to visual impact, integration and rural character, built heritage, natural heritage, flooding and drainage, access and road safety, pollution and contamination, land stability and associated safety, residential amenity and sewerage. The proposal complies with all relevant planning

policies including the Northern Area Plan, SPPS Ed 2, PPS 2, PPS 3, PPS 6, PPS 15, PPS 16 and PPS 21. Approval is recommended.

10 CONDITIONS

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

Reason: Time Limit.

2. The development hereby approved shall be used for holiday accommodation only and shall not be used for permanent accommodation.

Reason: The site is located outside of any settlement limit where planning policy restricts development and this consent is hereby granted solely because of its proposed holiday use.

3. All hard and soft landscaping works shall be carried out in accordance with the details indicated on Drawing No. 02C. The hard landscaping works shall be carried out prior to the occupation of any part of the development unless otherwise agreed in writing by the Council. The soft landscaping works shall be carried within the first available planting season following commencement of development. Any existing or proposed trees or plants indicated on the approved plans which, within a period of five years from the date of planting, die, are removed (other than those to be felled within the approved Tree Survey and as indicated on Drawing No. 02C) or become seriously damaged, diseased or dying shall be replaced during the next planting season with other trees or plants of a location, species and size, details of which shall have first been submitted to and approved in writing by the Council. All hard surface treatment of open parts of the site shall be permeable or drained to a permeable area. All hard landscape works shall be permanently retained in accordance with the approved details

Reason: In the interests of the character and appearance of the area.

4. All construction activity and materials (including spoil) shall be confined within site boundaries, and the Craigahullier ASSI designated area shall not be disturbed in any way without written consent from Northern Ireland Environment Agency.

Reason: To protect the site selection features for Craigahullier ASSI.

5. No works, vegetation clearance, disturbance by machinery, dumping or storage of materials shall take place within the 25m badger protection zones without the consent of the Planning Authority in consultation with NIEA or unless an appropriate Wildlife Licence has been obtained from NIEA. The protection zones shall be retained and maintained until all construction activity has been completed on site.

Reason: To protect badgers and their setts on the site.

6. No development activity, including ground preparation or vegetation clearance, shall take place until a competent ecologist has been appointed as an Ecological Clerk of Works (ECoW) for the implementation of the Habitat Management Plan indicated on Drawing No. 10. The details, roles and responsibilities of the ECoW submitted to, and agreed in writing by the Planning Authority in consultation with NIEA.

Reason: To ensure effective implementation of the Habitat Management Plan.

7. A suitable buffer of at least 10m must be maintained between the location any refuelling, storage of oil/fuel, concrete mixing and washing areas, storage of machinery/material/spoil etc. and any surface drains present onsite or adjacent to the site.

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

8. The external lighting scheme pertaining to the development hereby approved shall be designed and installed in accordance with the criteria specified in Drawing No. 51/CR/PK/23 REV 5, dated 3 June 2025, and the criteria detailed in the Outdoor Lighting Report, dated 3 June 2025.

Reason: In the interests of visual amenity, residential amenity and natural heritage.

9. Light pollution shall be obviated by ensuring the external lighting scheme pertaining to the development hereby approved is operated

and maintained in accordance with the criteria stipulated in the Institute of Lighting Professionals Guidance Note for the Reduction of Obtrusive Light – GN 01: 2021.

Reason: In the interests of visual amenity and residential amenity.

10. Vertical Lux levels at nearest residential receptors shall not exceed those values stipulated in Table 3: Maximum Values of Vertical Illuminance on Premises applicable to Environmental Zone E2, as per the Institute of Lighting Professionals Guidance Note for the Reduction of Obtrusive Light – GN 01:2021.

Reason: In the interests of visual amenity and residential amenity.

11. The development hereby approved shall not become operational until the temporary cesspool is provided in the location and installed in accordance with the details specified on Drawing No. 02C. The cesspool shall operate in accordance with the notes as indicated on Drawing No. 02C until a connection can be made to the NIW foul sewer after which the cesspool shall be decommissioned and removed from the site.

Reason: To ensure a method of foul sewerage is available to serve the proposal pending a connection to NIW foul sewer.

12. No development shall commence until the applicant has demonstrated to the satisfaction of the Council, that NIW are content that the proposed development will not affect public sewers traversing the proposed development site, and sufficient drawings have been submitted, which clearly indicate the required wayleaves

Reason: To prevent disturbance / damage to existing sewers and in the interest of public safety.

13. The drainage network shall be designed and constructed in accordance with Amended Flood Risk Assessment Doc 01A.

Reason: To ensure appropriate surface water drainage of the site.

14. If during the development works, new contamination or risks are encountered which have not previously been identified, works should cease and the Planning Authority shall be notified

immediately. This new contamination shall be fully investigated in accordance with the Land Contamination: Risk Management (LCRM) guidance available AT <https://www.gov.uk/guidance/landcontamination-how-to-manage-the-risks>. In the event of unacceptable risks being identified, a remediation strategy shall be agreed with the Planning Authority in writing, and subsequently implemented and verified to its satisfaction.

Reason: Protection of environmental receptors to ensure the site is suitable for use.

15. After completing the remediation works under Condition 14 and prior to occupation of the development, a verification report needs to be submitted in writing and agreed with Planning Authority. This report should be completed by competent persons in accordance with the Land Contamination: Risk Management (LCRM) guidance available at <https://www.gov.uk/guidance/landcontamination-how-to-manage-the-risks>. The verification report should present all the remediation, waste management and monitoring works undertaken and demonstrate the effectiveness of the works in managing all the risks and wastes in achieving the remedial objectives.

Reason: Protection of environmental receptors to ensure the site is suitable for use.

16. The development hereby approved shall commence operations until a 2.4-metre-high acoustic fence is erected in the location indicated on Figure 8 of the Noise Impact Assessment and Drawing No. 02C. The acoustic fence shall have no gaps or perforations and have a minimum surface mass of 12kg/m². The acoustic fence shall be retained for the lifetime of the development.

Reason: In the interests of the amenity of users of the development hereby approved.

17. Deliveries including HGV movements pertaining to the development hereby approved shall only take place during daytime hours (07:00h to 23:00h).

Reason: In the interests of the amenity of the area, nearby residents and users of the development hereby approved.

18. No live entertainment or recreational events shall operate from the development hereby approved.

Reason: In the interests of the amenity of the area and nearby residents.

19. Within 4 weeks of the Causeway Coast and Glens Borough Council being notified of a reasonable noise complaint from the occupant of a dwelling which lawfully exists or has planning permission at the date of this consent, the permitted development operator shall at his/her expense employ a suitably qualified and competent person to undertake a noise survey in to order to:
- ☐ assess the level of noise emissions from the permitted development. (the duration of such monitoring shall be sufficient to provide comprehensive information on noise levels with the development operating at the maximum capacity).
 - ☐ Details of the noise monitoring survey shall be submitted to Causeway Coast and Glens Borough Council for written approval prior to any monitoring commencing.
 - ☐ 2-week prior notification of the date of commencement of the survey shall be provided. The noise monitoring survey information shall include detail of any breaches; recommendation of mitigation measures required, and confirmation of implementation of mitigation measures and evidence of noise emission conformance.
 - ☐ The survey information shall be provided within 4 weeks (unless extended with Causeway Coast and Glens Borough Council) further to a written request from the Council.

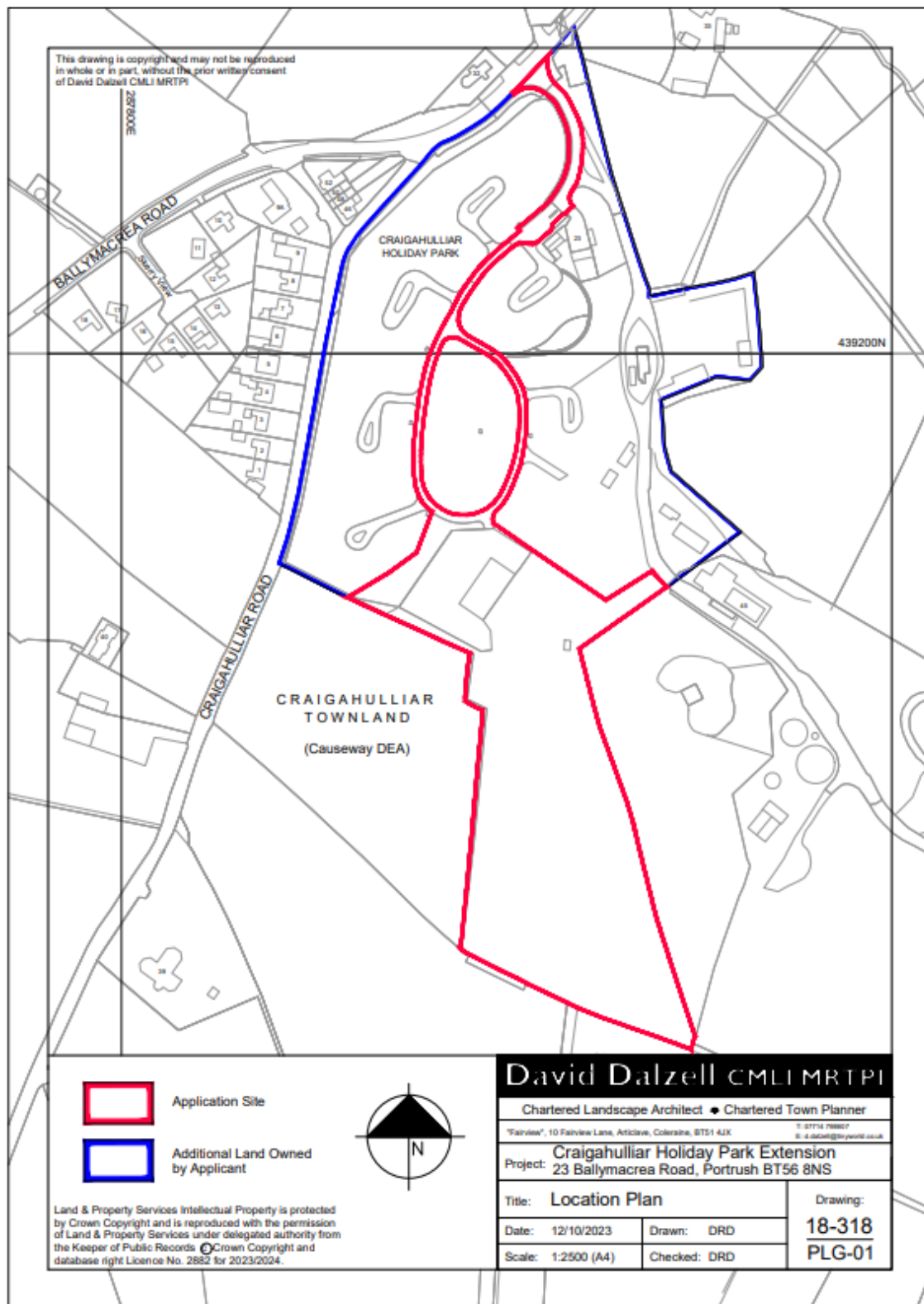
Reason: In the interests of the amenity of nearby residents.

11 INFORMATIVES

1. This permission does not confer title. It is the responsibility of the developer to ensure that he controls all the lands necessary to carry out the proposed development.
2. This approval does not dispense with the necessity of obtaining the of the owners of adjacent dwellings for the removal of or building on the party wall or boundary whether or not defined.

3. This permission does not alter or extinguish or otherwise affect any existing or valid right of way crossing, impinging or otherwise pertaining to these lands.
4. This determination relates to planning control only and does not cover any consent or approval which may be necessary to authorise the development under other prevailing legislation as may be administered by the Council or other statutory authority.
5. You should refer to any other general advice and guidance provided by consultees in the process of this planning application by reviewing all responses on the Planning Portal at:
<https://planningregister.planningssystemni.gov.uk/simple-search>

Site Location Map



Block Plan



Addendum

LA01/2023/1085/F

1.0 Update

- 1.1 Following publication of the Planning Committee Schedule for 22 April 2026, a further objection has been received on the proposal.
- 1.2 The following matters are raised:
- Lack of neighbour notification of the proposal.
 - Inadequate advertisement of the proposal.
 - Increased traffic along Ballymacrea Road which is not currently equipped to safely handle a substantial rise in traffic numbers.
 - Temporary foul cesspool raises serious concerns regarding potential odour and environmental impact.
- 1.3 The additional objector property is No. 34 Ballymacrea Road. This address does not satisfy the neighbour notification requirements as it is not located on land which directly adjoins the application site as outlined in red on the Site Location Plan. This property was identified within the PAN as to be notified of the Pre-application Community Consultation event. The application was advertised in the Coleraine Chronicle on 01 November 2023 and 19 June 2024 and is listed on the Council's website. Accordingly, there has been adequate public advertisement of the proposal.
- 1.4 Concerns in relation to traffic along Ballymacrea Road highlight that appropriate traffic management measures must be implemented and could include traffic calming measures, reduced speed limits or the installation of traffic lights to ensure safety of

both residents and visitors.

- 1.5 Traffic management measures were included under application C/2013/0097/F relating to the creation of the holiday park. These measures related to the creation of four passing bays along Ballymacrea Road and improvement of Ballymacrea Road/Ballybogy Road/Ballymagarry Road junction. Conditions 17, 18 and 19 of C/2013/0097/F related to the implementation of these works. DfI Roads has been consulted on this proposal and is content.
- 1.6 The temporary foul cesspool solution has been raised by the objector. Specific issues identified are potential odour and environmental impact. Further information on the foul cesspool has been submitted from the Agent. This information requires consideration by the Environmental Health Department. In addition, the objector should be afforded the opportunity to consider this information and provide comment (if any). To enable this process, the application should be deferred and returned to a subsequent meeting of the Planning Committee.

2.0 Recommendation

- 2.1 That the Committee note the contents of this Addendum and resolve to defer the application to allow further consideration of the further information relating to the cesspool and objector concerns. This recommendation supersedes that at Paragraph 1.1 of the Planning Committee Report.

Addendum 2

LA01/2023/1085/F

1.0 Update

- 1.1 The application was deferred at the Planning Committee meeting of 22nd April 2026 to allow for further consideration of matters relating to the cesspool which were also raised by an objector at No. 34 Ballymacrea Road.
- 1.2 Additional objections were received further to deferral of the application which were subsequently withdrawn by the objector. The number of objections currently received is three.
- 1.3 Amendments were received which sought to address the matters raised at that time including matters in relation to land ownership.

Proposed cesspool

- 1.4 Further information on the foul cesspool was submitted from the Agent with consultation issued to Environmental Health Department and re-notification to the neighbours and objectors.
- 1.5 A temporary cesspool is sought to be used until such time that a connection can be made to the public foul sewer. The cesspool is indicated on the Site Plan Drawing No. 02C to the rear of Plots 25 and 26. Further siting details are indicated on Cross-Section A-A of Site Cross-Sections Drawing No. 04B. The specification of the cesspool is indicated on Drawing No. 13. The proposed cesspool is a 26,000 litre Kingspan Single Neck Cesspool.
- 1.6 The cesspool is indicated to be installed in accordance with building regulations, to receive only foul sewage with no surface water and installed and sealed so there will be no discharge or

leaks to the water environment. The cesspool is to be impervious to both liquid from the inside and subsoil water from the outside and ventilated to a high-level point at least 15m away from existing or proposed caravans. The cesspool is indicated to have a vent fitted to the neck to provide localised venting and that the vent pipe is to be at least 2.4 metre high above ground level. An activated carbon filter is proposed to be fitted onto the end of the vent pipe with details of a PolyAir Vent including an information leaflet and specification submitted.

- 1.7 The Agent advises that under British Water Code of Practice Flows and Loads that caravan sites (static, fully serviced) are deemed to generate a loading of 150 litres per person per day. Average occupancy rates are indicated based on the 2024 Economic Benefit Report: Holiday Parks and Campsites Northern Ireland to peak at 81% in high season, 66% in mid season and 40% in low season with the average total group size of 3.1 persons. At 81% occupancy, a 26,000 litre tank is indicated to be sufficient for 2.6 days for the 26 pitches proposed. This extends to 3.2 days at 66% occupancy and 5.3 days at 40% occupancy.
- 1.8 The Agent indicates that the cesspool will be fitted with a high-level warning alarm to monitor levels in the tank so that it will be emptied before it reaches capacity and prevent overflows. A response to this alarm is indicated to be carried out at any time by Blairs Caravans. Based on occupancy the cesspool is indicated to likely be emptied every 2 – 3 days high/mid-season and every 5 - 6 days in low season. The Agent indicates that the high-level warning alarm will be checked regularly to ensure its operating properly with probes removed and checked after each emptying. The installation and surroundings are indicated to be visually inspected weekly for signs of damage, leaks or overflows. The cesspool is indicated to be maintained in good condition by Blairs Caravan Limited or the cesspool manufacturer under a service agreement. Emptying is indicated to be by a registered licensed waste carrier. Record of emptying and maintenance will be kept by

the Applicant.

1.9 The cesspool is highlighted by the Agent to be a temporary solution and that when mains connection to the public sewer becomes available and is approved by NI Water then all foul drainage from the development shall discharge to the public sewer. The Agent advises they are finalising a solution to the foul sewer capacity issue with NI Water and that once connection to the public sewer has been made, the use of the cesspool will cease and it shall be decommissioned. The Agent advises that it expects the process with NI Water could take 12 months to be finalised with the required drainage scheme implemented. The Agent indicates that the temporary cesspool arrangement is likely to be in place for approximately a year.

1.10 Environmental Health advise that they have no objection in principle to the proposed cesspool subject to the inclusion of four conditions. These conditions relate to

1. The temporary cesspool serving the development shall be installed, operated and maintained in accordance with the details submitted by the Applicant, namely:

- Storage capacity of 26,000 litres;
- High-level alarm system
- Location as shown on Drawing No. 02C, date stamped 25th September 2025;

The cesspool shall be retained and operated in accordance with these details for the duration of its use.

Reason: To ensure an appropriate temporary means of foul sewerage is available on the site and in the interests of the amenity of occupiers of the holiday park and surrounding area.

2. The cesspool shall be fitted with the approved odour control measures comprising:

- A dedicated vent pipe extending to a minimum height of 2.4m above ground level;
- An activated carbon filter, specifically the PolyAir 4-inch (110mm) Activated Carbon Filter as detailed within the submitted documentation, or an equivalent approved odour control system providing no lesser level of performance

The approved odour control measures shall be retained and maintained in effective working order for the duration of the cesspool operation.

Reason: In the interests of the amenity of occupiers of the holiday park and surrounding area.

3. The cesspool shall be used only as a temporary foul drainage solution pending implementation of the permanent foul drainage infrastructure identified within the application documentation and associated correspondence with Northern Ireland Water. The cesspool shall cease operation and be decommissioned upon connection to the permanent drainage system, or within 12 months of first occupation / a date specified by Planning, whichever occurs sooner.

Reason: In the interests of the amenity of the occupiers of the holiday and surrounding area and to ensure the provision of a mains sewerage to serve the development in accordance with the requirements of criterion (j) of Policy TSM 7 of Planning Policy Statement 16: Tourism.

4. The cesspool shall be emptied at intervals not exceeding:
- 3 days during the High and Mid-Season periods; and
 - 6 days during the Low Season period.

Records of all cesspool emptying operations shall be retained and made available to the Planning Authority upon request.

Reason: In the interests of the amenity of occupiers of the holiday park and surrounding area.

- 1.11 Criterion (g) of Policy TSM 6 and criterion (j) of Policy TSM 7 of PPS 16 indicates the preference for utilisation of mains foul sewerage where possible. The utilisation of mains sewerage was initially sought under this application with issues of network capacity highlighted by NI Water. The long term usage of a cesspool is not considered to be sustainable or to provide a pleasant environment for users considering the frequency of emptying required.
- 1.12 Condition 4 requested by Environmental Health outlines that the cesspool should be emptied at intervals not exceeding 3 days during the high and mid-season periods. The Agent advises that at 81% occupancy, a 26,000 litre tank is indicated to be sufficient for 2.6 days for the 26 pitches proposed. At 100% capacity, there would be a requirement for servicing of the cesspool at a higher interval than 2.6 days. This would conflict with the frequency not exceeding every 3 days required in consultation with the Environmental Health Department. Accordingly, it is a matter for the operator of the site to manage occupancy during the period the cesspool solution is operational. This is reasonable given that the cesspool solution is only anticipated for 12 months.
- 1.13 Having regard to the supporting information received regarding the cesspool, the response from Environmental Health and objector concerns outlined under Addendum 1, there are no concerns in relation to the impact of the cesspool on occupiers of the holiday park or third party receptors or the environment with adherence to the previously outlined conditions. The cesspool shall cease operation and be decommissioned upon connection to the permanent drainage system, or within 12 months of first occupation to ensure its usage as a temporary measure only.

Land Ownership

- 1.14 The application site has been reduced to omit parts of two parcels of land that are mapped by Land Registry in two other third party folios. An updated application certificate was submitted in relation to change in the extent of the application site.
- 1.15 In relation to the proposed layout the Agent indicates that these parcels of land lie inside the established post and wire fence which physically encloses the development site on the southern boundary. The Agent advises it is not proposed to alter this fence or to carry out any development in the small strips outside the Applicant's ownership. The Agent advises that these are part of the southern woodland belt and are to be left in their natural state. In relation to tree works, the Agent advises that Trees G15, G16 to T20 inclusive, T22, T24 – 26 inclusive and T28 to G32 inclusive have no action required. The Agent advises Trees T21 and T23 have works and are growing on the Applicant's side of the folio line and be carried out. A 1.1 metre mesh fence is indicated to be proposed along the access road to conserve the land between the access road and the existing post and wire fence as a natural, wooded area.
- 1.16 The matter of land ownership is a civil matter and it is a matter for the Applicant to ensure they control all land required to implement their proposal. The details provided indicate no conflict with conditions previously applied in the Planning Committee report.

Residential Amenity

- 1.17 Further planning policy assessment is provided in relation to overlooking and the associated impact on residential amenity.

- 1.18 The application site is located at two differing elevations which are connected by an internal road. Any views from the caravans at the lower elevation of the site will be similar to that found in the existing caravan site. The location of the proposed caravan units at the higher elevation benefits from existing vegetation screening and mounding which is viewable on the Site Cross Sections Drawing No. 04B which assists in restricting views. Similarly, views from the internal road benefit from mature vegetation screening.
- 1.19 Given the significant separation distances to the nearest residential receptors, there are no concerns in relation to any overlooking or impact on privacy of third party properties.
- 1.20 No further representations have been received further to re-notification of the amended plans and supporting information received.

2.0 Recommendation

- 2.1 That the Committee note the contents of this Addendum and resolve to approve the application subject to the conditions listed under Paragraph 3.0 of this addendum.

3.0 Conditions

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

Reason: Time Limit.

2. The development hereby approved shall be used for holiday accommodation only and shall not be used for permanent accommodation.

Reason: The site is located outside of any settlement limit where planning policy restricts development and this consent is hereby granted solely because of its proposed holiday use.

3. All hard and soft landscaping works shall be carried out in accordance with the details indicated on Drawing No. 02C. The hard landscaping works shall be carried out prior to the occupation of any part of the development unless otherwise agreed in writing by the Council. The soft landscaping works shall be carried within the first available planting season following commencement of development. Any existing or proposed trees or plants indicated on the approved plans which, within a period of five years from the date of planting, die, are removed (other than those to be felled within the approved Tree Survey and as indicated on Drawing No. 02C) or become seriously damaged, diseased or dying shall be replaced during the next planting season with other trees or plants of a location, species and size, details of which shall have first been submitted to and approved in writing by the Council. All hard surface treatment of open parts of the site shall be permeable or drained to a permeable area. All hard landscape works shall be permanently retained in accordance with the approved details

Reason: In the interests of the character and appearance of the area.

4. All construction activity and materials (including spoil) shall be confined within site boundaries, and the Craigahullier ASSI designated area shall not be disturbed in any way without written consent from Northern Ireland Environment Agency.

Reason: To protect the site selection features for Craigahullier ASSI.

5. No works, vegetation clearance, disturbance by machinery, dumping or storage of materials shall take place within the 25m badger protection zones without the consent of the Planning Authority in consultation with NIEA or unless an appropriate Wildlife Licence has been obtained from NIEA. The protection zones shall be retained and maintained until all construction activity has been completed on site.

Reason: To protect badgers and their setts on the site.

6. No development activity, including ground preparation or vegetation clearance, shall take place until a competent ecologist has been appointed as an Ecological Clerk of Works (ECoW) for the implementation of the Habitat Management Plan indicated on Drawing No. 10. The details, roles and responsibilities of the ECoW submitted to, and agreed in writing by the Planning Authority.

Reason: To ensure effective implementation of the Habitat Management Plan.

7. A suitable buffer of at least 10m must be maintained between the location any refuelling, storage of oil/fuel, concrete mixing and washing areas, storage of machinery/material/spoil etc. and any surface drains present onsite or adjacent to the site.

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

8. The external lighting scheme pertaining to the development hereby approved shall be designed and installed in accordance with the criteria specified in Drawing No. 51/CR/PK/23 REV 5, dated 3 June 2025, and the criteria detailed in the Outdoor Lighting Report, dated 3 June 2025.

Reason: In the interests of visual amenity, residential amenity and natural heritage.

9. Light pollution shall be obviated by ensuring the external lighting scheme pertaining to the development hereby approved is operated and maintained in accordance with the criteria stipulated in the Institute of Lighting Professionals Guidance Note for the Reduction of Obtrusive Light – GN 01: 2021.

Reason: In the interests of visual amenity and residential amenity.

10. Vertical Lux levels at nearest residential receptors shall not exceed those values stipulated in Table 3: Maximum Values of Vertical Illuminance on Premises applicable to Environmental Zone E2, as per the Institute of Lighting Professionals Guidance Note for the Reduction of Obtrusive Light – GN 01:2021.

Reason: In the interests of visual amenity and residential amenity.

11. The development hereby approved shall not become operational until the temporary cesspool is provided in the location and installed in accordance with the details specified on Drawing No. 02C. The cesspool shall operate in accordance with the notes as indicated on Drawing No. 02C until a connection can be made to the NIW foul sewer after which the cesspool shall be decommissioned and removed from the site.

Reason: To ensure a method of foul sewerage is available to serve the proposal pending a connection to NIW foul sewer.

12. No development shall commence until the applicant has demonstrated to the satisfaction of the Council, that NIW are content that the proposed development will not affect public sewers traversing the proposed development site, and sufficient drawings have been submitted, which clearly indicate the required wayleaves

Reason: To prevent disturbance / damage to existing sewers and in the interest of public safety.

13. The drainage network shall be designed and constructed in accordance with Amended Flood Risk Assessment Doc 01A.

Reason: To ensure appropriate surface water drainage of the site.

14. If during the development works, new contamination or risks are encountered which have not previously been identified, works should cease and the Planning Authority shall be notified immediately. This new contamination shall be fully investigated in accordance with the Land Contamination: Risk Management (LCRM) guidance available at <https://www.gov.uk/guidance/landcontamination-how-to-manage-the-risks>. In the event of unacceptable risks being identified, a remediation strategy shall be agreed with the Planning Authority in writing, and subsequently implemented and verified to its satisfaction.

Reason: Protection of environmental receptors to ensure the site is suitable for use.

15. After completing the remediation works under Condition 14 and prior to occupation of the development, a verification report needs to

be submitted in writing and agreed with Planning Authority. This report should be completed by competent persons in accordance with the Land Contamination: Risk Management (LCRM) guidance available at <https://www.gov.uk/guidance/landcontamination-how-to-manage-the-risks>. The verification report should present all the remediation, waste management and monitoring works undertaken and demonstrate the effectiveness of the works in managing all the risks and wastes in achieving the remedial objectives.

Reason: Protection of environmental receptors to ensure the site is suitable for use.

16. The development hereby approved shall commence operations until a 2.4-metre-high acoustic fence is erected in the location indicated on Figure 8 of the Noise Impact Assessment and Drawing No. 02C. The acoustic fence shall have no gaps or perforations and have a minimum surface mass of 12kg/m². The acoustic fence shall be retained for the lifetime of the development.

Reason: In the interests of the amenity of users of the development hereby approved.

17. Deliveries including HGV movements pertaining to the development hereby approved shall only take place during daytime hours (07:00h to 23:00h).

Reason: In the interests of the amenity of the area, nearby residents and users of the development hereby approved.

18. No live entertainment or recreational events shall operate from the development hereby approved.

Reason: In the interests of the amenity of the area and nearby residents.

19. Within 4 weeks of the Causeway Coast and Glens Borough Council being notified of a reasonable noise complaint from the occupant of a dwelling which lawfully exists or has planning permission at the date of this consent, the permitted development operator shall at his/her expense employ a suitably qualified and competent person to undertake a noise survey in to order to:
 - ☐ assess the level of noise emissions from the permitted development. (the duration of such monitoring shall be sufficient to

provide comprehensive information on noise levels with the development operating at the maximum capacity).

- ☐ Details of the noise monitoring survey shall be submitted to Causeway Coast and Glens Borough Council for written approval prior to any monitoring commencing.
- ☐ 2-week prior notification of the date of commencement of the survey shall be provided. The noise monitoring survey information shall include detail of any breaches; recommendation of mitigation measures required, and confirmation of implementation of mitigation measures and evidence of noise emission conformance.
- ☐ The survey information shall be provided within 4 weeks (unless extended with Causeway Coast and Glens Borough Council) further to a written request from the Council.

Reason: In the interests of the amenity of nearby residents.

20. The temporary cesspool serving the development shall be installed, operated and maintained in accordance with the details submitted by the Applicant, namely:

- Storage capacity of 26,000 litres;
- High-level alarm system
- Location as shown on Drawing No. 02C, date stamped 25th September 2025;

The cesspool shall be retained and operated in accordance with these details for the duration of its use.

Reason: To ensure an appropriate temporary means of foul sewerage is available on the site and in the interests of the amenity of occupiers of the holiday park and surrounding area.

21. The cesspool shall be fitted with the approved odour control measures comprising:
- A dedicated vent pipe extending to a minimum height of 2.4m above ground level;
 - An activated carbon filter, specifically the PolyAir 4-inch (110mm) Activated Carbon Filter as detailed within the submitted

documentation, or an equivalent approved odour control system providing no lesser level of performance

The approved odour control measures shall be retained and maintained in effective working order for the duration of the cesspool operation.

Reason: In the interests of the amenity of occupiers of the holiday park and surrounding area.

22. The cesspool shall be used only as a temporary foul drainage solution pending implementation of the permanent foul drainage infrastructure identified within the application documentation and associated correspondence with Northern Ireland Water. The cesspool shall cease operation and be decommissioned upon connection to the permanent drainage system, or within 12 months of first occupation whichever occurs sooner.

Reason: In the interests of the amenity of the occupiers of the holiday and surrounding area and to ensure the provision of a mains sewerage to serve the development in accordance with the requirements of criterion (j) of Policy TSM 7 of Planning Policy Statement 16: Tourism.

23. The cesspool shall be emptied at intervals not exceeding:
- 3 days during the High and Mid-Season periods; and
 - 6 days during the Low Season period.

Records of all cesspool emptying operations shall be retained and made available to the Planning Authority upon request.

Reason: In the interests of the amenity of occupiers of the holiday park and surrounding area.

4.0 INFORMATIVES

1. This permission does not confer title. It is the responsibility of the developer to ensure that he controls all the lands necessary to carry out the proposed development.
2. This approval does not dispense with the necessity of obtaining the of the owners of adjacent dwellings for the removal of or building on the party wall or boundary whether or not defined.
3. This permission does not alter or extinguish or otherwise affect any existing or valid right of way crossing, impinging or otherwise pertaining to these lands.
4. This determination relates to planning control only and does not cover any consent or approval which may be necessary to authorise the development under other prevailing legislation as may be administered by the Council or other statutory authority.
5. You should refer to any other general advice and guidance provided by consultees in the process of this planning application by reviewing all responses on the Planning Portal at:
<https://planningregister.planningsystemni.gov.uk/simple-search>

Addendum 3

LA01/2023/1085/F

1.0 Update

- 1.1 The application was deferred at the Planning Committee meeting of 26th September 2026 to allow for a site visit.
- 1.2 Two additional objections were received by one objector further to the publication of the agenda for the September Planning Committee which were to be dealt with via a verbal addendum. The matters raised are now considered in this written addendum.

Further Objections

- 1.3 In the objection received 24th August 2026 concerns are raised in relation to the Environmental Health response and the temporary cesspool. The objection outlines the cesspool is very close to, if not partially under a number of the proposed lodges and queries if this is not a health risk and contrary to Environmental Health and Building Control regulation regarding separation distances. The cesspool is outlined to be very close to the edge of the drop onto the caravans below, with no apparent bunding and it is queried if this were to fail or overflow would this be an acceptable risk to the occupants of these units. The objector outlines that NI Water were consulted regarding the potential connection to the public sewer and there is no reference to an agreement with NI Water despite almost 3 years since the application was submitted. The objector concludes that it is likely this temporary cesspool will be required for the foreseeable future. The application is requested to be deferred until these issues can be investigated or a public sewer connection is available.

- 1.4 In the objection received 25th August 2026 the proposal is outlined to fail to comply with key policy requirements and to materially conflict with the development plan.
- 1.5 Reference is made to Section 6(4) of the Planning Act (Northern Ireland) 2011 that determinations must be made in accordance with the development plan unless material considerations indicate otherwise. The objector outlines that the site lies within the open countryside as designated in the Northern Area Plan 2016 and is not subject to any zoning which would support this form of development. Accordingly, the proposal must be assessed against restrictive countryside policies, where development is only permitted in exceptional circumstances. The proposal is outlined to depart from the general presumption against development in the countryside unless strict criteria are met.
- 1.6 The objector references Policy CTY 1 of PPS 21 which permits tourism-related development in the countryside only where it accords with PPS 16. Policy TSM 6 is referred allowing extensions to holiday parks. The proposal is outlined to be described as an extension and goes beyond what could reasonably be a modest or ancillary expansion. The proposal being characterised as a modest or proportionate extension to the holiday park is queried. The existing park is outlined to measure 3.83 hectares and the expansion adds a further 2.17 hectares representing a 62% increase which is a substantial enlargement of the overall development footprint. The application description is indicated to be misleading and fail to accurately reflect the true scale, extent and nature of the proposed development. The proposal is indicated to represent a material intensification and expansion of the use, rather than a limited extension and fails to satisfy the intent of Policy TSM 6. The proposal is outlined to introduce a substantial number of additional units onto previously undeveloped land of 35 additional caravan units. When considered cumulatively with the existing development this is indicated to represent a notable intensification of the use of the site and a step-change in its overall

scale and character.

- 1.7 The proposal is outlined to fail to demonstrate that it sensitively designed or appropriately integrated into its setting and rural locality. The development is outlined to occupy elevated and exposed parts of the sites and relies heavily on future planting, habitat creation and screening measures to mitigate its visual impact. The reliance on mitigation indicates the development is not acceptable in its own right and does not meet the policy requirement for integration.
- 1.8 The site, layout and intensity of the development is indicated to give rise to adverse impacts on the character of the area, introduce a more suburban and visually prominent form of development into a rural landscape. This is outlined to be contrary to the requirements of PPS 16 to protect environmental quality and ensure tourism development is compatible with its surroundings.
- 1.9 The proposal is outlined to fail to respect and integrate with the landscape and to adversely affect rural character. The development is indicated to extend onto higher ground including built form that is currently open and visually sensitive. Increased visibility from surrounding roads and viewpoints are indicated to fundamentally alter the character of the landscape. The photomontages are indicated to not be fully reliable or a robust representation of the likely visual impact of the proposed development. The photomontages are outlined to follow standard presentation formats but there is no clear evidence they are accurately scaled or calibrated to reflect true visual perception and they appear to rely on favourable viewpoints, seasonal vegetation and prominence of perspectives which tend to minimise the apparent scale and prominence of the development. This is outlined to be significant given the 62% expansion and further 35 caravan units provided. The images are outlined to consistently under-represent the density and extent of the development when compared with the approved site layout and fail to adequately

demonstrate the visual effects from more sensitive or elevated view points. Limited weight should be afforded to the photomontages as they risk understating the true landscape and visual balance of the proposal. Viewpoints are indicated to not be selected which illustrate the potential adverse impacts at this location especially from Corbally Road closer towards the junction of Gateside Road.

- 1.10 The proposal is indicated to conflict with Policies CTY 13 and 14 of PPS 21 which relate to appropriate siting, layout and design and protection of rural character by ensuring development does not become prominent or visually intrusive. The proposal is outlined to heavily rely on proposed planting, future landscaping and screening measures to reduce its visual impact rather than demonstrate the development is suitably integrated at the outset. The submitted layout and photomontages indicate that a number of units are located on elevated and exposed parts of the site with visibility mitigated primarily through vegetation not yet established and may vary seasonally. The policy approach is indicated to be that development should be acceptable on its own right without reliance on mitigation over time to satisfy Policies CTY 13 and 14.
- 1.11 The proposal is indicated to result in suburbanisation and cumulative urbanisation contrary to PPS 21 and the SPPS. The proposal is indicated to result in unacceptable harm to rural character and fails to meet integration tests. The Landscape and Habitat Management Plan is indicated to fundamentally demonstrate the proposed development does not integrate into the rural setting with extensive mitigation to reduce its impact. The heavy dependence on new planting, woodland belts, habitat creation areas and landscape mounding to screen and assimilate the development over time rather than show it is appropriately sited and designed from the outset. The identification of specific mitigation and compensation enforces that the development gives rise to adverse landscape and ecological affects requiring offsetting. The effectiveness of these measures is indicated to be

uncertain and will only materialise over a prolonged period during which the development remains visually exposed given its elevated position.

- 1.12 The objector outlines that the site adjoins and partially interacts with an Area of Special Scientific Interest (ASSI). The objector notes that while consultees have not objected subject to conditions, that the proposal introduces development in close proximity to sensitive environmental designations, relies on mitigation and management measures to prevent harm and involves increased human activity, lighting, drainage and disturbance in vicinity of the ASSI. The new drainage infrastructure is indicated to result in new pathways for potential environmental impact particularly where such systems are reliant on temporary or non-standard solutions. Cumulatively there is potential to adverse the integrity, function and setting of the designated area.
- 1.13 The proposal is outlined to be dependent on a temporary foul cesspool due to lack of capacity. Concerns in relation to the lack of adequate permanent infrastructure, reliance on off-site removal of waste by tanker and no certainty when a permanent connection will be available are raised. This arrangement is indicated to be contrary to principles of sustainable development under the SPSS which requires infrastructure should be in place to support the development. This temporary and operationally intensive solution is not consistent with good planning practice and undermines the acceptability of the proposal.
- 1.14 The site is outlined to be in an area of known historic mining activity and while Geological Survey have not objected their position is based on the classification of the development as non-permanent and involving limited groundworks. This approach is indicated to not eliminate the underlying risk but reframes it based on development type. Given the scale of the development and the presence of access roads and infrastructure, it is reasonable to question whether the risks have been fully and robustly assessed.

- 1.15 Concerns are raised with the conclusion of the Environmental Impact Assessment conclusion that the proposal is unlikely to give rise to significant environmental effects and does not require an Environmental Statement. The development is indicated by the objector to exceed the relevant site area threshold and be located within a sensitive environmental context including proximity to an ASSI and other environmental receptors. The determination is indicated to acknowledge a range of potential impacts including landscape and visual effects, ecological disturbance, hydrological connections and cumulative impacts with existing development and nearby landfill operations yet dismisses these as not significant without adequate analysis or evidence. The over-reliance on mitigation measures at screening stage is outlined to be contrary to EIA principles which requires the assessment of impacts in the absence of such mitigation. The scale of the development is outlined to not be properly reflected in the assessment of significance. The conclusion that the proposal would not give rise to significant environmental effects is not considered to be adequately reasoned and fails to adopt the precautionary approach required by the SPPS. The objector considers the proposal should have been subject to full Environmental Impact Assessment.
- 1.16 The Pre-Application Community Consultation process is indicated by the objector to be procedurally completed and demonstrates extremely limited engagement with minimal attendance and feedback. Concerns are raised in relation to the effectiveness of the consultation and extent to which local impacts have been meaningfully considered.
- 1.17 The objector concludes that the proposal is framed as policy compliant and this conclusion relies heavily on assumptions reading future mitigation, acceptance of temporary infrastructure solutions and downplaying of landscape and visual impacts. The objector considers the proposal to fail to integrate into the landscape, results in unacceptable harm to rural character, relies

on unsustainable infrastructure arrangements and is beyond what can be reasonably be considered an acceptable extension. The proposal is indicated to be contrary to the Northern Area Plan 2016, SPPS, PPS, PPS 15, PPS 16 and PPS 21 and they request permission is refused.

Consideration

- 1.18 The objector outlines that the site is not subject to any zoning which support this form of development. A site is not required to be located within a specific land use zoning to be acceptable. The site is located in the open countryside as shown in the Northern Area Plan 2016. Furthermore, land use zoning is not carried out outside Settlement Development Limits. The proposal has been considered principally under Policy TSM 6 of PPS 16 as identified by the objector.
- 1.19 The objector raises that the extension goes beyond what could be reasonably be a modest or ancillary expansion. The policy test under Policy TSM 6 does not stipulate what constitutes an acceptable size of extension, nor is it based on the site area or the number of units. The policy test requires that the proposal creates a high quality and sustainable form of tourism development and that the location, siting, size, design, layout and landscaping of the holiday park must be based on an overall design concept that respects the surrounding landscape, rural character and the site context. The site is required to be located in an area with capacity to absorb the holiday park without adverse impact on visual amenity and rural character.
- 1.20 The size of the extension is not required to specified in the application description. The extension is indicated by the objector to be smaller than the original holiday park site by the figures they have provided. The site is an addition of 35 static caravans units which is additional to the 129 static caravan number of units

approved for the existing site.

- 1.21 Concerns have been raised under Policies CTY 13 and 14 of PPS 21 in relation to integration and rural character. Both these policies relate to proposed buildings. As outlined at Paragraph 8.10, the proposal does not include any proposed buildings. The proposal relates to plots for static caravans which are not buildings. Consequently, Policies CTY 13 and 14 are not applicable to this proposal.
- 1.22 The objector raises issues with the level of landscaping/planting that is proposed. Policy TSM 6 requires that all holiday park developments are accompanied by a layout and landscaping plan. The Landscape and Habitat Management Plan has been submitted to address this as well as ecological requirements under PPS 2. Consequently, further planting is required under the planning policy remit. The proposal is not reliant on new planting and benefits from the existing landscaping and landform. Further landscaping of the site assists in softening of the development.
- 1.23 The proposal is deemed to result in a more suburban and visually prominent form of development in a rural landscape. As outlined under Paragraph 8.170 of the Planning Committee Report, Policy TSM 6 of PPS 16 indicates that holiday parks are an acceptable form of development in the countryside.
- 1.24 A detailed assessment has been made in relation to the visual impact, integration of the proposal and rural character under the Design, Integration and Rural Character of the Planning Committee report at Paragraphs 8.4 – 8.46 having regard to Planning Policy CTY 1 and TSM 6 and TSM 7 requirements.
- 1.25 The reliability and robustness of the photomontages have been queried. No evidence has been submitted by the objector which challenges the veracity of the photomontages. The photomontages have been completed by Digital Aspect who specialise in creating

photomontages. The photomontages have then been submitted by a Chartered Landscape Architect. The content of the photomontages has been considered and given weight having regard to observations upon site visit and proposed details of the scheme including landscaping arrangements. The most prominent areas of the site are identified as critical views and are considered at Paragraphs 8.27 – 8.39 of the Planning Committee report. The specified location to be considered at Corbally Road and the junction of Gateside Road is approximately 800 metres from the site. Views of the site are possible from this location. Longer distant views are considered at Paragraph 8.31 of the Planning Committee Report.

- 1.26 The site adjoins and is partially within Craigahulliar ASSI as outlined by the objector. The assessment of the impacts of this designation by consultees are acknowledged by the objector. Detailed assessment of the impact on ecological matters are considered under Paragraphs 8.65 – 8.83 of the Planning Committee Report. Northern Ireland Environmental Agency declare land to be designated as an ASSI and make the assessment for operations and activities requiring consent in Areas of Special Scientific Interest. All Public Bodies have a duty to protect and enhance the features for which an ASSI has been designated. Consultation was sought with NIEA under this application as required under the Consultation Arrangements of The Planning (General Development Procedure) Order (Northern Ireland) 2015. No concerns have been raised by NIEA in relation to impact of this proposal on this designated site and they have recommended conditions.
- 1.27 Concerns have been raised by the objector that this scheme relies on mitigation and management measures to prevent harm. Policy NH 3 of PPS 2 outlines that planning permission will only be granted for a development proposal that is not likely to have an adverse effect on the integrity, including the value of the site to the habitat network, or special interest of an Area of Special Scientific

Interest. Through consultation with the competent authority an adverse effect is not likely. In the instance that an adverse effect was likely, Policy NH 3 states that in such cases, appropriate mitigation and/or compensatory measures will be required. Given that this scheme is unlikely to cause an adverse effect and mitigation and management are included these measures are permissible within the policy requirements.

- 1.28 The objection of 24th August 2026 regarding the cesspool was sent by the objector directly to the Senior Environmental Health Officer who provided the response on this application.
- 1.29 Comment was sought from Environmental Health in relation to the contents of this objection. Environmental Health advise that they have considered the comments together with the proposed location and specification of the temporary cesspool, as part of its consultation on the planning application. Environmental Health advise that the submitted details, including the proposed capacity, high-level alarm, location, odour control measures and emptying regime, have been assessed, and conditions have been recommended to ensure that the cesspool is appropriately managed for the duration of its use.
- 1.30 Environmental Health advise that to their knowledge there is no prescribed statutory minimum separation distance between a cesspool and a dwelling or holiday lodge. The recommended conditions they provided are intended to ensure that the cesspool is appropriately operated and maintained and to minimise the likelihood of adverse impacts on the amenity and health of occupiers. Detailed compliance with the Building Regulations, including the detailed construction and siting of the drainage installation, is outlined to be a matter for Building Control as part of the Building Regulations process.
- 1.31 On the basis of the information submitted, Environmental Health has no objection to the proposed temporary foul drainage

arrangement, subject to the recommended conditions.

- 1.32 The matters raised in relation to the cesspool are considered to be robustly considered and are outlined under Addendum 2. The cesspool is considered only to be appropriate as a temporary measure to address sewerage with permanent usage unsustainable as highlighted by the objector. Control of the cesspool is outlined under Conditions 20 – 23. The extent of usage of the cesspool is outlined under Condition 22 for a maximum of 12 months after occupation of the first unit. The period of 12 months is considered to be a reasonable length of time under which approval for NI Water could be received. The decommissioning of the cesspool is also addressed through Condition 22.
- 1.33 The Geological Survey for Northern Ireland are the competent authority who deals with abandoned mines and advises the Planning Department on abandoned mines and their risks to the public. Comments were previously submitted by the objector on mines. Land stability and the previous objector comments were considered under Paragraphs 8.96 – 8.113 of the Planning Committee Report. The supporting information received under this application in relation to land stability and mine workings was completed by a Geo-technical Engineer and Chartered Geologist. GSNI has advised that they are content with the proposal as presented. This matter is considered to be fully and robustly assessed.
- 1.34 The impacts of the proposal are considered within the Screening Opinion completed under Regulation 12 of The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017. The assessment of the impacts of the proposal under Regulation 12 is against the selection criteria outlined under Schedule 3 of the 2017 EIA Regulations and not planning policy as highlighted by the objector. The assessment is required to consider the characteristics of the potential impact and the likely significant effects. The possibility of effectively reducing the impact is

specifically outlined to be assessed. Consequently, mitigation is required to be considered. Having considered the impacts of the proposal both alone and cumulatively, the proposal is not considered to result in a significant environmental effect.

- 1.35 There is no requirement for any property notified to engage with the community consultation process and a lack of engagement by the public does not indicate a failure to correctly carry out consultation. The Pre-Application Community consultation arrangements are outlined at Paragraph 4.3 of the Planning Committee Report and the consultation proposed was agreed under LA01/2023/0126/PAN. The outcomes of the consultation process are outlined under Paragraphs 4.4 – 4.8 of the Planning Committee Report and are considered to be satisfied.

2.0 Recommendation

- 2.1 That the Committee note the contents of this Addendum and resolve to approve the application subject to the conditions listed under Paragraph 3.0 of Addendum 2.