

From:
Sent: 25 August 2026 19:06
To: Planning; Joshua Chisim
Subject: LA01/2023/1085/F / Objection

Re: Planning Application LA01/2023/1085/F - Craigahulliar Holiday Park, 23 Ballymacrea Road, Portrush. Extension of Existing Holiday Park

Dear CC&GBC Planning

We write to formally object to the above planning application.

This objection is made having regard to the Northern Area Plan 2016, the Strategic Planning Policy Statement for Northern Ireland Ed 2 (SPPS), and relevant Planning Policy Statements including PPS 16 (Tourism), PPS 21 (Sustainable Development in the Countryside), PPS 2 (Natural Heritage), and PPS 15 (Planning and Flood Risk).

While the proposal is presented as an extension to an existing holiday park, a detailed assessment demonstrates that it fails to comply with key policy requirements and materially conflicts with the development plan when properly considered.

1. Development Plan Context and Statutory Test

Under Section 6(4) of the Planning Act (Northern Ireland) 2011, determinations must be made in accordance with the development plan unless material considerations indicate otherwise. 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 therefore represents a departure from the general policy presumption against development in the countryside unless strict criteria are met.

2. Principle of Development – Planning Policy Assessment

Policy CTY 1 of PPS 21 permits tourism-related development in the countryside only where it accords with PPS 16. Policy TSM 6 of PPS 16 allows extensions to existing holiday parks only where they:

- Create a high-quality and sustainable form of tourism development.

- Do not result in unacceptable visual or environmental impacts.
- Integrate appropriately with the surrounding landscape.
- Protect rural character.

While the proposal is described as an extension, its scale and spatial extent go significantly beyond what could reasonably be considered as a modest or ancillary expansion. In this instance, the proposal cannot reasonably be characterised as a modest or proportionate extension to this holiday park.

The existing park measures approximately 3.83 hectares, whereas the proposed extension adds a further 2.17 hectares, representing an increase of approximately 62 percent in site area. This is not a marginal or incremental expansion but rather a substantial enlargement of the overall development footprint. As such, the application description is both misleading and fails to accurately reflect the true scale, extent and nature of the proposed development

This represents a material intensification and expansion of the use, rather than a limited extension, and therefore fails to satisfy the intent of Policy TSM6.

To expand further, the proposal fails to demonstrate that it is sensitively designed or appropriately integrated into its setting and rural locality. As evidenced by the submitted layout, photomontages, and landscape strategy, the development occupies elevated and exposed parts of the site and relies heavily on future planting, habitat creation, and screening measures to mitigate its visual impact. This reliance on mitigation indicates that the development is not acceptable in its own right and does not meet the policy requirement for inherent integration.

In addition, the scale, layout, and intensity of the development give rise to adverse impacts on the character of the surrounding area, introducing a more suburban and visually prominent form of development into a rural landscape. This is contrary to the requirement within PPS 16 to protect environmental quality and ensure that tourism development is compatible with its surroundings.

Instead, it constitutes a significant expansion in both scale and spatial extent as outlined, introducing a substantial number of additional units onto previously undeveloped land.

In addition to the significant increase in land take, the proposal seeks therefore to introduce 35 additional caravan units. When considered cumulatively with the existing development, this represents a notable intensification of the use of the site and a step-change in its overall scale and character.

This materially alters the nature of the development and undermines the basis upon which such proposals are considered acceptable under policy.

3. Design, Landscape Impact and Rural Character

The SPPS and PPS 21 require that development in the countryside must respect and integrate with the landscape and not adversely affect rural character.

The proposal fails in this regard for the following reasons:

3.1 Elevated and Prominent Development

The development extends onto higher ground, introducing built form into areas that are currently open and visually sensitive. This creates increased visibility from surrounding roads and viewpoints, fundamentally altering the character of the landscape.

The submitted photomontages do not provide a fully reliable or robust representation of the likely visual impact of the proposed development. While they follow standard presentation formats, there is no clear evidence that they are accurately scaled or calibrated to reflect true visual perception, and they appear to rely on favourable viewpoints, seasonal vegetation, and wide-angle perspectives which tend to minimise the apparent scale and prominence of development. This is particularly significant given that the proposal involves a substantial 62% expansion of the site and introduces 35 additional caravan units onto elevated and previously undeveloped land.

The images 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 viewpoints. As such, the photomontages risk understating the true landscape and visual impact of the proposal and should be afforded limited weight in the planning balance.

There are critical viewpoints which have not been selected which offer a more sensitive view of the application site and can illustrate the potential adverse impacts of the development at this location especially from the Corbally Road closer towards the junction of Gateside Road.

3.2 Reliance on Mitigation Rather than Inherent Integration

The scheme relies heavily on:

- Proposed planting;
- Future landscaping;
- Screening measures.

However, policy requires that development should integrate by virtue of its siting and design and not depend on mitigation to reduce its impact over time.

The proposal's reliance on mitigation measures rather than inherent integration gives rise to clear conflict with Policies CTY 13 and CTY 14 of PPS 21.

Policy CTY 13 requires that development in the countryside must integrate into the landscape through appropriate siting, layout, and design, while Policy CTY 14 seeks to protect rural character by ensuring development does not become prominent or visually intrusive.

In this case, the scheme is heavily dependent on proposed planting, future

landscaping and screening to reduce its visual impact, rather than demonstrating that 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 that is not yet established and may vary seasonally.

This approach is contrary to the clear policy requirement that development should be acceptable in its own right, without reliance on mitigation over time, and therefore fails to satisfy the fundamental tests of CTY 13 and CTY 14.

3.3 Erosion of Rural Character

The introduction of additional units, access roads, infrastructure, and associated paraphernalia into open countryside results in suburbanisation and cumulative urbanisation, contrary to the aims of PPS 21 and the SPPS.

Accordingly, the proposal results in unacceptable harm to rural character and fails to meet the integration tests required by policy.

Furthermore, to reinforce our concerns, the submitted Landscape and Habitat Management Plan, while detailed, fundamentally demonstrates that the proposed development is not inherently integrated into its rural setting and instead relies on extensive mitigation to reduce its impacts. The plan confirms a heavy dependence on new planting, woodland belts, habitat creation areas and landscaped mounding to screen and assimilate the development over time, rather than showing that it is appropriately sited and designed from the outset. The identification of specific mitigation and compensation areas further reinforces that the development gives rise to adverse landscape and ecological effects which require offsetting. In addition, the effectiveness of these measures is uncertain and will only materialise over a prolonged period, during which the development will remain visually exposed, particularly given its elevated position. This approach is contrary to the clear requirements of

Policies CTY 13 and CTY 14 of PPS 21, which require development to integrate with the landscape in its own right and resist proposals that are visually prominent or reliant on mitigation to achieve acceptability.

4. Natural Heritage

The site adjoins and partially interacts with land designated as an Area of Special Scientific Interest (ASSI).

While consultees have not objected subject to conditions, the proposal:

- Introduces development in close proximity to sensitive environmental designations;
- Relies on mitigation and management measures to prevent harm;
- Involves increased human activity, lighting, drainage, and disturbance.

The nature of the development will inevitably result in increased levels of human activity within the vicinity of the ASSI, including noise, movement, lighting, and general disturbance. In addition, the introduction of new drainage infrastructure and foul management arrangements presents further pathways for potential environmental impact, particularly where such systems are reliant on temporary or non-standard solutions. These factors, when considered cumulatively, have the

potential to adversely affect the integrity, function and setting of the designated area.

Drainage and Sewerage – PPS 15

The proposal is dependent on a temporary foul cesspool arrangement due to the lack of capacity in the public sewer network.

This raises serious concerns:

- The development is proceeding without adequate permanent infrastructure;
- The solution relies on off-site removal of waste by tanker;
- There is no certainty as to when a permanent connection will be available

This is contrary to the principles of sustainable development embedded within the SPSS, which requires that infrastructure should be in place to support development. The reliance on a temporary and operationally intensive solution is not consistent with good planning practice and undermines the acceptability of the proposal.

5. Land Stability and Mining Risk

The site lies within an area of known historic mining activity. While the Geological Survey has ultimately not objected, this position is based on the classification of the development as non-permanent and involving limited groundworks.

This approach does not eliminate the underlying risk but rather 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.

6. Environmental Impact Assessment

The proposal falls within Schedule 2 development under the Planning (Environmental Impact Assessment) Regulations (NI) 2017 and exceeds the relevant site area threshold.

Given:

- The scale of development;
- The sensitive environmental context;
- The potential for cumulative impacts;

The Environmental Impact Assessment (EIA) screening determination concludes that the proposal is unlikely to give rise to significant environmental effects and therefore does not require an Environmental Statement. However, this conclusion is not robustly justified and fails to properly apply the requirements of the Planning (Environmental Impact Assessment)

Regulations (Northern Ireland) 2017. The development clearly falls within Schedule 2, Category 12(e), exceeds the relevant site area threshold, and is located within a sensitive environmental context, including proximity to an ASSI and other environmental receptors.

The determination acknowledges a range of potential impacts, including landscape and visual effects, ecological disturbance, hydrological considerations, and cumulative impacts with existing development and nearby landfill operations, yet dismisses these as not significant without adequate analysis or evidence. In particular, there is an over-reliance on mitigation measures at the screening stage,

contrary to established EIA principles which require the assessment of impacts in the absence of such mitigation. Furthermore, the scale of the development, including a substantial expansion onto previously undeveloped and elevated land and the introduction of 35 additional units, is not properly reflected in the assessment of significance. The conclusion that the proposal would not give rise to significant environmental effects is therefore inadequately reasoned and fails to adopt the precautionary approach required by the SPPS, and it is considered that the proposal should have been subject to full Environmental Impact Assessment.

7. Community Consultation

The Pre-Application Community Consultation process, while procedurally completed, demonstrates extremely limited engagement, with minimal attendance and feedback.

This raises concerns regarding the effectiveness of the consultation and the extent to which local impacts have been meaningfully considered.

8. CONCLUSION / Overall Planning Balance

While the proposal is framed as policy-compliant, this conclusion relies heavily on the assumptions regarding future mitigation, acceptance of temporary infrastructure solutions and the downplaying of landscape and visual impacts.

When assessed rigorously against the development plan and relevant policy framework, the proposal:

- Fails to integrate appropriately into the landscape;
- Results in unacceptable harm to rural character;
- Relies on unsustainable infrastructure arrangements;
- Extends development beyond what can reasonably be considered an acceptable “extension”.

For the reasons outlined above, the proposal is contrary to:

The Northern Area Plan 2016;

The Strategic Planning Policy Statement (SPPS);

PPS 16 (Tourism);

PPS 21 (Sustainable Development in the Countryside);

PPS 2 (Natural Heritage);

PPS 15 (Planning and Flood Risk).

Accordingly, we respectfully request that planning permission is refused.