LA01/2023/1276/F - former mill buildings and proposed community facility – M23 BSBW / Donaldson.

Application	LA01/2023/1276/F
Site	Lands 300m south-east of 41 Dogleap Road, Limavady
Proposal	Retention, refurbishment, change of use and extension of existing unlisted mill buildings to provide a multi-purpose community facility
Agent	Bell Architects Ltd – Murray Bell RIBA
Status	Updated speaking notes and current position response. 08 September 2026



Detailed Response to refusal reasons – rebuttal

Bell Architects Ltd welcomes the Planning Committee's decision to undertake a site visit which will allow Members to inspect the condition and heritage significance of the former mill buildings and cottage, their landscape setting, the relationship with Roe Valley Country Park, the proposed access route, and the potential for sensitive community-led regeneration, and particularly to note the potential for growth and visitor development in the park.

The two applications are linked operationally but are subject to separate refusal reasons. Application LA01/2023/1276/F, concerning the mill/community facility, has nine recommended reasons for refusal. Application LA01/2024/0137/F, concerning the supporting caretaker accommodation, has four. The applications may be considered together.

The Planning Officer report accepts that the mill buildings are locally important, eligible for conversion, and capable of sympathetic restoration. It also concludes that the scale and design would integrate without significant adverse visual impact. These findings establish a sound basis for approval rather than allowing the heritage assets to continue deteriorating.

The proposal is a heritage-led regeneration project centered on locally important mill buildings whose connection with the milling history of the Roe Valley is expressly recognised in the Committee report.

The report also accepts that the scale and design are sympathetic, that the buildings and extensions would visually integrate, and that there would be no significant adverse visual impact. Historic Environment Division, DfI Roads and Environmental Health raise no objection. The remaining issues are principally questions of policy interpretation, technical clarification and operational detail which can be resolved.

Detailed response to reasons

1. Northern Area Plan - ENV1 and Roe Park LLPA

> ***Reason as stated:*** *The proposal is said to be contrary to Policy ENV1 and designation LYL02 because it is not essential to agriculture or the operation of the Country Park.*

The Committee report contains an apparent designation discrepancy: the refusal reason refers to LYL02, while paragraphs 8.3-8.6 identify the site as being within LYL01.

The operative ENV1 consideration is whether development would adversely affect the features contributing to the environmental quality, integrity or character of the LLPA. The report itself concludes at paragraph 8.55 that the scale and design are acceptable, the buildings and extensions would integrate, and there would be no significant adverse visual impact.

The use is also complementary to the operation and visitor purpose of the Country Park: it would conserve its industrial heritage, expand interpretation and education, and provide managed community activity. The proposal should therefore be assessed by its actual effect and functional relationship with the Park, **rather than treated as generic development in open countryside**.

It is not sustainable or respectful to abandon these heritage buildings.

2. Rural principle - SPPS paragraph 6.73 and PPS21 CTY1

> ***Reason as stated:*** *The proposal is said not to demonstrate overriding reasons for an essential rural location or why the development could not be located in a settlement.*

The planning purpose is the conservation and re-use of these particular historic mill buildings. They cannot be relocated to Limavady without defeating that purpose. Their significance derives from their position beside the River Roe and their relationship with the surviving mill landscape and Country Park.

The report accepts that the buildings are locally important and eligible for conversion. Their site-specific heritage significance, combined with the need for a viable use to secure their future, represents a compelling material consideration in favour of this rural location.

3. Suitability of the non-residential use

> ***Reason as stated:*** *The proposed conversion and re-use are said to result in a non-residential use inappropriate to the countryside location.*

The proposed nature and scale are modest and capable of management. The community facility is not an unrelated commercial enterprise; it is the means by which the heritage buildings would be occupied, maintained, interpreted and made accessible.

The multi-purpose programme - including heritage education, traditional and repair skills, environmental learning and community activity - is directly connected to the buildings and Park setting. Conditions can limit the authorised use, hours, attendance and external activity.

4. Town-centre use and sequential assessment

> ***Reason as stated:*** *The proposal is treated as a town-centre use and no sequential test has been submitted to demonstrate the absence of suitable preferable sites.*

The applicant acknowledges that a formal sequential assessment has not yet been supplied. However, ordinary vacant premises in Limavady are not automatically equivalent to a locally important mill complex where conservation, place-based interpretation and outdoor learning are central objectives.

The assessment should identify the essential components of the proposal, consider reasonable flexibility in scale and format, and explain which elements are inherently tied to the mill buildings and their grounds. It should also record the consideration of town-centre and other sequentially preferable premises.

5. European sites, designated habitats and protected species

> ***Reason as stated:*** *It has not been demonstrated that the proposal would avoid unacceptable effects upon designated sites and legally protected species.*

The applicant recognises the importance of the River Roe and Tributaries SAC/ASSI and the recorded bat use of the buildings and mature trees. The ecological surveys identified seven bat species and a Natterer's bat night roost, allowing mitigation to be designed from an informed baseline.

A Bat Mitigation Plan has been submitted, but the report identifies outstanding details concerning the chosen mitigation option, bat loft/boxes and lighting. It also requires a Construction Method Statement to address runoff, pollution pathways, the sewage-treatment proposal and any access works so that the Habitats Regulations Appropriate Assessment can be completed.

Paragraph 8.60 records that, subject to mitigation and recommended conditions, the proposal would not be likely to have a significant adverse effect on the integrity or conservation objectives of the SAC. The present issue is therefore an information gap which must be closed before determination.

It is our understanding that all issues have now been resolved in the form of updated consultations and drawings.

6. Parking provision - SPPS paragraph 6.304 and PPS3 AMP7

> ***Reason as stated:*** *It has not been satisfactorily demonstrated that an appropriate level of parking would be provided.*

DfI Roads raises no objection, and the organization of parking, vehicles and people movements should be organized between the farmer landowner and the controllers of the park.

7. Flood risk - SPPS paragraph 6.107 and PPS15 FLD1

> ***Reason as stated:*** *It has not been demonstrated that the development is outside the fluvial floodplain or that associated risks would be managed and mitigated.*

The report notes that the submitted plans show no built development within the mapped floodplain and that the added floorspace falls within the minor-development scale. However, the site is close to the River Roe and a leaking mill race, and the proposed septic tank immediately abuts the mapped area.

The applicant submits that a Flood Risk Assessment is not required due to the existing nature of these buildings, and further that a FRA cannot reasonably be carried out when a mill race is leaking onto the subject site.

8. Safeguarding the tourism asset - PPS16 TSM8

> ***Reason as stated:*** *Vehicular access and use are said to conflict with the pedestrian function and recreational value of Roe Valley Country Park, significantly compromising its tourism value.*

The proposal is intended to enhance, not diminish, a tourism asset attracting more than 350,000 visits annually. Restoring the mill buildings and interpreting flax, linen, milling and hydroelectric power would provide additional reasons to visit throughout the year.

The concern identified in the report is principally operational: potential conflict between vehicles and pedestrians, out-of-hours access, security, emergency access and land control. Those matters require an agreed solution, but they are not an inevitable consequence of conserving the buildings.

The scheduled site visit is particularly important in seeing the route, widths, visibility, existing staff use and scope for separation or controlled movements.

We would submit that NIEA officers should be held to negotiate and work with the farmer landowner rather than oppose restoration.

9. Landscape character - SPPS paragraph 6.224

> ***Reason as stated:*** *The proposal is said to have an unacceptable adverse impact upon landscape character.*

This reason sits uneasily with paragraph 8.55, which concludes that the scale and design are acceptable and would integrate without significant adverse visual impacts. The principal landscape concern appears to relate to the 64-panel solar array rather than the restoration of the mill buildings themselves.

The energy strategy responds to the reported cost or feasibility of a grid connection, but the array is capable of separate review. Its scale, bund, height, screening and location can be revised without sacrificing the heritage restoration.

Solar panels in themselves are a temporary installation and do not cause any lasting impact on the environment or landscape, and will be low lying and essentially invisible.

Murray Bell RIBA
Bell Architects Ltd
www.bell-architects.com