

Implementation Date: 01 September 2023

Template for Requesting Speaking Rights at the Planning Committee

The Protocol for the Operation of the Planning Committee provides for interested person(s) to register to speak on a planning application that is scheduled to be determined at the next meeting of the Planning Committee. This request must be received by the Planning Department no later than 10am on the Monday before the Planning Committee meeting via email account planning@causewaycoastandglens.gov.uk.

Planning Reference	LA01/2022/1531/F
Name	Michael Duff
Contact Details	Tel: Email:
Support or Objection – please tick relevant box	Support <input type="checkbox"/> Objection <input type="checkbox"/>

Written representation summarising key points to be addressed and supplementary information in support of your case (minimum font size 10 and maximum length two sides of A4 page).

This application seeks to convert an existing original outhouse/barn, previously used as a commercial premises, into 3x one-bedroom short-stay visitor accommodation units within walking distance of the WHS (only 25 meters).

The applicants are third-generation owners who will continue to reside in the main house adjacent to the barn, addressing a clear demand for sustainable, locally owned short-stay accommodation.

The proposal aligns with the historical nature of the property which has previously operated as:

- a guesthouse for visitors to the WHS since late 1800's (formerly known as "Warren View")
- the headmaster's residence for The Causeway School
- the famous Giant's Causeway Post Office (1896 to 1975)
- a fair trade shop "Traidcraft" until early 2000's and valued as a hybrid domestic/commercial property

The Development Management Officer Report classifies the outhouse as **"a locally important building."**

REFUSAL REASON 1:

The proposal is contrary to Policy COU 4 of the Northern Area Plan 2016, Paragraph 6.6 of the Strategic Planning Policy Statement for Northern Ireland and Policy BH5 of PPS6 in that the site lies within the Distinctive Landscape Setting of the Giant's Causeway and Causeway Coast World Heritage Site. The proposed barn conversion does not qualify as an exception and therefore does not justify a relaxation of the strict planning controls in this area.

REBUTTAL TO REFUSAL REASON 1:

Policy COU 4 of the NAP allows development with the DLS that meet one of three circumstances as described in paragraph 8.5 of the Executive Summary.

Policy COU4 Condition 1 permits developments that are “exceptionally modest in scale, without landscape detriment, and necessary to meet the direct needs of visitors to the WHS.” This proposal meets these criteria being:

- Exceptionally modest, fully contained within existing footprint, with minimal external modification, no extensions, or visible change to the exterior.
- No landscape detriment, with no changes to the visual landscape for visitors to the WHS, walking trails, or Causeway Road approach.
- Meets a direct need for visitors to the WHS by providing accessible accommodation within walking, step-free distance to the WHS.

The Executive Summary paragraph 8.10 (b) confirms that

“These changes are considered appropriate to facilitate the conversion and will maintain the form, character and design of the existing building. The proposed conversion will not harm the character or appearance of the locality given these appropriate alterations. Public views of this proposal are restricted from Causeway Road due to the siting to the rear of the existing house.”

We contend that the proposal is acceptable under condition 1 and that the planning officer’s interpretation of Policy COU4 is overly restrictive and inconsistent with the overall objectives of the Northern Area Plan 2016 and other relevant policies.

Furthermore, Policy COU4 Condition 2 allows for extensions of up to 20%, yet this proposal, which includes no extensions (0%), is being recommended for refusal as it is not classified as an “extension”. Condition 2 does not specify that an extension must be for “existing use” as stated in paragraph 8.6. This reasoning is counterintuitive and contrary to the aims of COU4.

The planning officer has not considered the expanded text and intent of Policy COU4:

Policy COU4 states that *“... some visitor related development is acceptable in this area. However, it should be small in scale, both in terms of built form and be directly related to the WHS and require a location in proximity to it...”*

This development meets all of these criteria as it is contained within an original historic building, only 25 metres via walking trail to the WHS, and is directly related to the WHS by its proximity and it’s historical ties to serving visitors of the WHS.

- **Policy COU4 aims** to prevent an imbalance between landscape and built form. Furthermore, Policy COU4 states that *“Historically, vernacular dwellings related to the traditional agricultural use of the land and accommodated farming families and workers. Houses were small in mass and scale, and normally single storey, with any extensions appearing as subservient elements to the main structure.”*

This proposal is fully contained within a historic vernacular building from the mid-1800s without altering the landscape.

The core objective of Policy COU4 is to safeguard the WHS landscape setting – this proposal achieves that.

Strategic Planning Policy Statement for Northern Ireland paragraph 6.6 and Policy BH 5 of PPS 6

The SPPS paragraph 6.6 states that:

“Development that would adversely affect the Outstanding Universal Value of a World Heritage Site (WHS) or the integrity of its setting must not be permitted unless there are overriding exceptional circumstances.”

Policy BH 5 of PPS 6 states that:

“The Department will operate a presumption in favour of the preservation of World Heritage Sites. Development which would adversely affect such sites or the integrity of their settings will not be permitted unless there are exceptional circumstances.”

The Executive Summary itself confirms at numerous points throughout paragraphs 8.10 and 8.18 that this

proposal will not harm the rural character or appearance of the locality, will not affect neighbouring residential amenity, does not adversely affect features of built or natural heritage, and most importantly that “it will not unacceptably harm the character of the AONB.” In fact, this development will ensure integrity of the WHS setting by safeguarding this “locally important building” through sustainable development.

These points illustrate that the development is compatible with SPPS paragraph 6.6 and Policy BH 5 of PPS 6. It will not adversely affect the site or integrity of the WHS setting and therefore does not require an overriding exceptional circumstance.

LOCAL ECONOMY AND SUSTAINABILITY

The recommendation to refuse exacerbates existing challenges related to local economic sustainability, deterioration of historic buildings, and second-home ownership in Bushmills and surrounding areas. Approving modest, non-intrusive developments such as this is crucial to supporting local residents and sustainable tourism.

PRECEDENT CASES

At least five larger scale developments have been approved within the DLS since NAP 2016 was implemented, highlighting ambiguity in policy interpretation as well as inconsistency in decision-making as they included larger-scale developments with visible alterations, one such development being granted as recently as October 2024.

Since the implementation of NAP 2016, at least five larger-scale developments have been approved within the DLS, demonstrating ambiguity in policy interpretation and inconsistency in decision-making. Notably, a barn conversion was granted as recently as October 2024, including visible alterations and an extension.

CONCLUSION

This proposal is a sustainable, historically sensitive, and modest development that aligns with planning policies aimed at supporting sustainable tourism, protecting the WHS landscape, and bolstering the local economy. The proposal has received no objections from relevant consultees including Neighbours, NI Water, Environmental Health and DFI Roads.

We respectfully request that the Planning Committee approve this application, ensuring the preservation of a “locally important building” while supporting sustainable tourism and the local economy.

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