Title of Report:	**Planning Committee Report – LA01/2020/0160/O**
Committee Report Submitted To:	**Planning Committee**
Date of Meeting:	**24th August 2022**
For Decision or **For Information**	**For Decision - Referred Application by Alderman Robinson & Alderman Fielding**

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	Senior 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

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 Assessment (DPIA)	Screening Completed:	N/A	Date:
	DPIA Required and Completed:	N/A	Date:

App No: LA01/2020/0160/O **Ward: Ballykelly**

App Type: Outline Planning

Address: Lands North of 131 Baranailt Road, Limavady

Proposal: Proposed infill of existing gap site for 2no. dwellings with detached garage in accordance with CTY 8 of PPS21

Con Area: N/A **Valid Date: 07.02.2020**

Listed Building Grade: N/A **Target Date: 22.05.2020**

Agent: CM Architectural Design, 36 Knockanbaan, Limavady, BT49 0UL

Applicant: Mr S Young, 219 Baranailt Road, Limavady, BT49 9LS

Objections: 2 **Petitions of Objection: 0**

Support: 0 **Petitions of Support: 0**

Executive Summary

- Outline planning permission is sought for two infill dwellings
- The site is located within the countryside, outside of any defined settlement development limit as defined in the Northern Area Plan 2016.
- The principle of development is considered unacceptable in regard to the SPPS and PPS21 as there is no substantial and continuously built up frontage at this location.
- No overriding reasons have been forthcoming as to why the development is essential and cannot be facilitated within the development limit.
- The proposal would have an adverse impact on rural character through adding to suburban style build-up and the creation of ribbon development.
- DFI Roads, Environmental Health, DAERA- Natural Environment Division, Northern Ireland Water, Historic Environment Division, Rivers Agency, the Health and Safety Executive and the Gas Pipeline operator were all consulted and have no concerns with the proposal.
- Environmental Health have highlighted the proximity of the application site in regards to existing agricultural sheds and operational Anaerobic Digestor plant.
- Two letters of objection have been received
- The application is recommended for Refusal in that it is contrary to Paragraphs 6.70 and 6.73 of the SPPS and Policies CTY1, CTY8 and CTY14 of PPS21.
- Reasons for Referral by elected member are attached as an annex to this report.

Drawings and additional information are available to view on the Planning Portal- http://epicpublic.planningni.gov.uk/publicaccess/

1 RECOMMENDATION

1.0 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 **Refuse** planning permission subject to the reasons set out in section 10.

2.0 SITE LOCATION & DESCRIPTION

2.1 The application site is located on lands to the north of No. 131 Baranailt Rd, Limavady. The application site is accessed via an existing laneway with the application site immediately abutting the laneway on the eastern side of the lane. The application site accounts for just under half of the existing field in which it is located. The western boundary along the laneway is currently defined by a hedgerow on top of an earth ditch approximately 2.5m in height with one tree within the boundary of approximately 5.5-6m in height. The northern boundary is defined by hedgerow and trees which range from 5m to 8 or 9m in height with farm buildings in close proximity to the boundary. The southern boundary is bounded by a laneway and is defined by hedgerow and trees approximately 4-5m in height. The eastern site boundary is undefined. There is a slight fall across the site in a south west to north east direction.

2.2 The application site is located within the rural area outside of any settlement limit as defined in the Northern Area Plan 2016. The application site is located in the vicinity of a cluster of dwellings, as well as in proximity to a number of farm buildings to the immediate north and a large Anaerobic Digester Plant almost directly opposite the application site. The application site is also located within the designated Ballykelly Moraine Site of Local Nature Conservation Importance (LNC 13) as defined in the Northern Area Plan 2016. The application site is located in proximity to an archaeological site and a gas pipeline.

3.0 RELEVANT HISTORY

3.1 No relevant planning history on application site

4.0 THE APPLICATION

4.1 Outline planning permission is sought for 2 infill dwellings within the rural area. No plans relating to the scale and design of the dwellings have been submitted. Access to the application site is via an existing laneway from the Baranailt Rd, which serves as access to a number of other dwellings, farmland and an Anaerobic Digestor Plant.

5.0 PUBLICITY & CONSULTATIONS

External: 2 objections from 2 separate addresses have been received to this application.

The issues raised within the objection letters relate to

- Refers to the extant planning history for the AD Plant on the opposite side of the lane and states that this application should be dealt with chronologically with the planning history of the adjacent AD plant and that this application should take these histories into account when determining this application
- Proposal does not comply with policy as it is not located within a substantial and continuously built up frontage
- Land ownership
- Traffic issues
- Lack of pedestrian footpath
- Health and Safety
- Habitats violation
- Light pollution
- Storm runoff flooding risk

Internal:

DFI Roads: No objections.

Environmental Health: No objections.

NI Water: No objections.

DAERA Natural Environment Division: No objections.

DAERA Water Management: No objections subject to available foul capacity at receiving WWTW

Historic Environment Division: No objections.

Health and Safety Executive: No objections.

Gas Pipeline Operator: No objections.

Rivers Agency: No objections.

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

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

Strategic Planning Policy Statement (SPPS)

Planning Policy Statement 2: Natural Heritage

Planning Policy Statement 3: Access, Movement and Parking

Planning Policy Statement 6: Planning, Archaeology and the Built Heritage

PPS 15: Planning and Flood Risk

PPS 21: Sustainable Development in the Countryside

A Planning Strategy for Rural Northern Ireland

8.0 CONSIDERATIONS & ASSESSMENT

Planning Policy

8.1 The proposed development must be considered having regard to the SPPS, PPS policy documents and supplementary planning guidance specified above. The main considerations in the determination of this application relate to: principle of development, integration and rural character, access, natural heritage, Habitats Regulation Assessment, built heritage, health and safety, proximity to gas pipeline, light pollution and storm run-off/flood risk, waste water disposal and representations.

Principle of Development

8.2 The policies outlined in paragraph 6.73 of the SPPS and Policy CTY 1 of PPS 21 state that there are a range of types of development which are considered acceptable in principle in the countryside. Other types of development will only be permitted where there are overriding reasons why that development is essential and could not be located in a settlement, or it is otherwise allocated for development in a development plan. The

application was submitted as an infill dwelling and therefore falls to be assessed against Policy CTY 8.

8.3 Policy CTY 8 entitled Ribbon Development states that planning permission will be refused for a building which creates or adds to a ribbon of development. An exception will be permitted for the development of a small gap site sufficient only to accommodate up to a maximum of two houses within an otherwise substantial and continuously built up frontage and provided this respects the existing development pattern along the frontage in terms of size, scale, siting and plot size and meets other planning and environmental requirements. The definition of a substantial and built up frontage includes a line of 3 or more buildings along a road frontage without accompanying development to the rear. This is reiterated by paragraph 6.73 of SPPS.

8.4 The application site is set back off Baranailt Rd approximately 120m along an existing laneway. The application site is located on the eastern side of the laneway. To the immediate north of the application site is a large agricultural shed and area of hardstanding which has a direct frontage onto the laneway. There are other sheds to the rear of this shed, however these do not have direct frontage onto the laneway and do not contribute to the formation of a substantial and continuously built-up frontage. To the immediate south of the application site is the dwelling and garage at No. 131, which is separated from the application site by a spur of the laneway.

8.5 The dwelling at No.131 has a frontage onto the laneway and occupies a presence towards the front of the plot however, the associated garage is located to the rear of the plot, wholly behind the dwelling. The siting and subordinate scale of the garage is such that it cannot be taken as being within a line of development contributing to the formation of a substantial and continuously built up frontage. South of No. 131 there is a small paddock field which visually and physically separates Nos. 131 from 129. No 129 is sited at the junction of the laneway and Baranailt Rd. This paddock between Nos 131 and 129 breaks any continuous line of built up frontage to the south of the application site and therefore No 129 cannot be taken into account when assessing the extent of the built-up frontage.

8.6 While the laneway to the immediate south of the application site does technically bisect the line of development, officials are satisfied that in this instance that given the limited width of the lane the 'break' does not provide any substantial visual relief between plots or does not represent a change in character and is not considered to represent a 'break' to the line of development at this location. Despite this, the line of development contributing to the formation of a built up frontage is limited to the shed to the north of the application site and dwelling at No. 131 to the south, which equates to only two buildings, and therefore is insufficient to meet with the definition of a substantial and continuously built up frontage in the policy, which requires a line of three buildings. As there is no built up frontage at this location there cannot be a gap in which to infill. Consequently the proposal is contrary to Paragraph 6.73 of the SPPS and Policy CTY8 of PPS21.

8.7 Additionally, the proposal would not be reflective of established character within the frontage in terms of plot widths. The yard/shed to the north has a frontage width of approximately 37m while the dwelling at No. 131has a frontage width of approximately 51m. This gives an average plot width of 44m. The application site is approximately 57.5m in length, which when split in two gives two equal plots of 28.75m. The gap building to building between the shed to the north and the dwelling at No. 131 is 72m, which could almost accommodate three dwellings of the scale proposed. The application site therefore would not be reflective of the pattern of development with the application site being too small for two dwellings and too large for one when considered against the surrounding plots. The proposal would again be contrary to Policy CTY8 for this reason.

8.8 As there is no substantial and continuously built-up frontage at this location, there is no gap in which to infill. As such the proposed dwellings would result in an addition to the development along the laneway and would be visually linked and share a common frontage onto the laneway with the adjacent buildings resulting in the creation of a ribbon development along the eastern side of the laneway. The proposal is contrary to Paragraph 6.70 of the SPPS and Policies CTY8 and CTY14 of PPS 21.

8.9 Additionally, as no overriding reason has been forthcoming as to why the development is essential in this location the development is contrary to Policy CTY1 of PPS21.

Integration and Rural Character

8.10 Both the SPPS and PPS21 outline that all development in the countryside is required to integrate into its setting, respect rural character and be appropriately designed.

8.11 The application site is only readily visible when travelling along the laneway in relatively close proximity to the application site. While much of the western boundary would be removed to facilitate access, some of its features will remain, such as a tree to its southern portion. The northern boundary is defined by hedgerow and sheds and the southern boundary defined by hedgerow. These features will remain which will assist with providing enclosure to the site. As views of the site are short, when passing No. 131 on approach from the south and passing the sheds to the north, officials are content that 2 modest dwellings could integrate within the site without any significant visual impact, assisted by an appropriate landscaping scheme. Subject to the above the proposal would meet with the requirements of the SPPS and Policy CTY13 of PPS21 in terms of integration.

8.12 Despite being located within the rural area the application site is located within an area which has a significant amount of built development. In the immediate vicinity of the application site there are agricultural sheds to the north, the dwelling at No. 131 to the south, and the dwelling and associated sheds directly opposite the site at No. 133, as well as an Anaerobic Digestor Plant to the north west of No. 133. The application site provides some visual relief within this immediate vicinity. Its development, when viewed with the existing buildings, would further contribute to and reinforce the built-up character of the area, would ribbon development and further erode the rural character of the area. Given the detrimental impact on rural character officials consider the proposal to be contrary to Paragraph 6.70 of the SPPS and Policy CTY14 of PPS21.

Access

8.13 Access to the site is proposed via the existing laneway. DFI Roads initially requested additional plans to be submitted to indicate widening of the laneway over the first 10m. However as has been demonstrated through appeal 2018/E0003 in respect of the Anaerobic Digestor Plant opposite the site the laneway is of sufficient width over the first 10m.

8.14 Amended plans have been received which indicate the required visibility splays and an updated Certificate has been received to indicate correct ownership of the laneway. DFI Roads have been re-consulted on the proposal and now offer no objection. The proposal is therefore in compliance with Policy AMP2.

8.15 DFI Roads have considered the objection letter received which highlights the issues relating to the level of traffic using the laneway and the need for a footpath to be provided to accommodate pedestrian movement along it. DFI consider no further upgrade to the laneway to be required including the need for a footpath.

Natural Heritage

8.16 Initial consultation with DAERA Natural Environment Division outlined the need for a Preliminary Ecological Appraisal to assess the natural heritage interests included protected species and habitats. A PEA was submitted by the applicant which concluded that there would be no significant adverse impact on any designated sites. The report has identified a number of species which have the potential to be impacted on, but mitigation has been proposed by way of timing of works and provision of alternative habitats sources such as bird boxes and hedgehog nest boxes.

8.17 The PEA has identified that there is suitable habitat features for bats along the northern and western site boundaries with the tree in the western boundary identified as having moderate bat roost potential. This tree was initially marked for removal to provide access to the proposed dwellings, and the PEA advised that further survey work would be required in the form of two bat activity surveys within the required window (May-September).

8.18 DAERA were consulted on this information and requested that the further survey works be carried out to assess the potential

impact on bats. In response to this request a submission from Elite Ecology outlined that the feature along the western boundary is to be retained and therefore survey works can be avoided. An amended plan was submitted by the agent 22/11/2021, which demonstrates that the tree along the western boundary with bat roost potential can be retained, while facilitating the development. DAERA were re-consulted on this information and have responded to indicate they now have no objections to the proposal.

8.19 Upon review of the PEA, Natural Environment Division in their response dated 13/05/2021 requested clarification on whether the badger survey was carried out to NIEA specification and whether the Phase 1 survey included invasive species. The response from Elite Ecology, received 28/06/2021 clarified that the badger survey and phase 1 survey were carried out in accordance with NIEA specific requirements. Subsequent consultation confirmed that NED were content that these two aspects of the PEA have been adequately addressed.

8.20 The application site is located within a designated Site of Local Nature Conservation Importance (LNC13) within the Northern Area Plan 2016. Ballykelly Moraine (LNC13) is designated for its earth science features including ridges and spread of morainic sand and gravel. Given the extent of existing built development around the application site coupled with the scale and nature of the proposed development it is not likely to impact upon the specific features of the designation and therefore meets the requirements of Policy ENV2 of the Northern Area Plan.

8.21 The applicant has demonstrated that the application will not have an unacceptable adverse impact on any protected species or any other natural heritage feature and therefore the proposal complies with the nature conservation policies outlined within the SPPS and PPS2.

Habitats Regulations Assessment

8.22 Shared Environmental Services were informally consulted to ascertain if there was likely to be any impact on any designated European site. Shared Environmental Services having considered the environmental information submitted (PEA) outlined that formal consultation was not necessary for the following reason.

8.23 The PEA does not record any open water on site but refers at 1.2 to 'An external ditch for the collection of run-off water is adjacent to the south site boundary.' Such a ditch, if open and with a flow, could theoretically form a pathway to Lough Foyle SPA and Ramsar site. However the SPA and Ramsar site are over 8 km downstream via hydrological pathway. In light of the scale and location of the development it can be objectively concluded that it would not be likely to have a significant effect on any European site.

8.24 The potential impact of this proposal on Special Protection Areas, Special Areas of Conservation and Ramsar sites has been assessed in accordance with the requirements of Regulation 43 (1) of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended). The proposal would not be likely to have a significant effect on the features of any European site.

8.25 In response to the comments raised within an objection letter in respect of the need for a Habitats Regulations Assessment (HRA) to determine the impact on protected species, and the potential for the proposal to impact on their habitats, Shared Environmental Services have clarified that Habitats Regulations Assessment is confined to assessment of impacts on European sites and their selection features therefore it is not required for the consideration of other protected or invasive species that are not site selection features. A HRA is not required given the above assessment by SES.

Built Heritage

8.26 The application site is on the periphery of the consultation zone of an identified archaeological site (enclosure). Historic Environment Division have been consulted on the proposal and have no objections from an archaeological perspective. The application meets with the archaeological requirements of the SPPS and PPS6.

Health and Safety

8.27 Initial consultation with Environmental Health highlighted the proximity of the application site to an existing Anaerobic Digester Plant to the west of the application site. Concerns were raised

regarding the potential impact both the approved and “as-built” AD Plant may have on the proposed dwelling and its associated amenity space.

8.28 During enforcement appeal 2018/E0003 which related to the alleged unauthorised anaerobic digestor, combined heat and power plant, ancillary equipment and structures and associated hard covered area (as-built) the appellant submitted an Environmental Statement (ES) and Further Environmental Information (FEI) which assessed the environmental impacts of the development including the potential impact on human health and residential amenity.

8.29 Chapter 7 within the ES provided a risk assessment which identified contamination sources, pathways, receptors and control measures to be implemented to prevent or minimise risk to health. The risk assessment concluded that there is no potential for significant impact on human health from the continued operation of the facility to which the Planning Appeals Commission (PAC) agreed.

8.30 A number of complaints have been submitted to Environmental Health regarding noise and odour from the AD Plant, both of which were assessed by the PAC. With respect to noise it was outlined by the appellant that existing installed mitigation measures have ensured that noise levels have been reduced to an acceptable level at the closest noise sensitive receptor (No. 133 Baranailt Rd). The PAC concluded that they are satisfied that noise levels from the operation of the AD Plant have been reduced to an acceptable level at the closest sensitive receptor and will not have an adverse impact on residential amenity. Conditions were imposed with regards noise levels to ensure the protection of residential amenity.

8.31 With regards to odour, the appellant provided details of mitigation measures which have been installed and have carried out a number of odour surveys which concluded that there were no AD gas odours detected off-site. An updated Working plan was submitted during the course of the hearing and the appellant proposed odour management conditions which would

deal with any malodour issues arising from the development. The PAC concluded that with robust conditions and strict adherence to the Working Plan, potential odour issues from the AD Plant would be successfully addressed.

8.32 The PAC considered that the AD Plant would, with mitigation and conditions, not pose any significant adverse impact on residential amenity. As a result of this and consideration of all other aspects of the appeal, permission was granted for the as-built AD Plant. The results of the surveys found that at the closest sensitive receptor (No. 133) that there were no significant adverse impacts.

8.33 Environmental Health were re-consulted on this proposal following the PAC decision. EHO advised that the decision on the proposal and the impact on residential amenity should be determined by the Planning Authority. Officials note that the application site and proposed siting of the proposed dwellings are located further away from the AD plant than No. 133. In assessing the potential impact of the AD Plant on the proposed dwellings, it can reasonably be assumed to be, at least, no worse than at No. 133. Given the findings of the PAC in respect of the potential impacts on the health and safety of closer adjacent residential properties officials could not refuse planning permission for the proposal on the basis that it would adversely impact the proposed development.

Gas Pipeline

8.34 The application site is within the vicinity of the North West Gas Pipeline. Both the Health and Safety Executive and the pipeline operator have been consulted and offer no objections.

Light pollution

8.35 Environmental Health were asked to provide comment in respect of concerns raised within an objection letter regarding the potential for light pollution from the proposed development upon the objector's property. Environmental Health commented that domestic lighting from the likes of porch lights and garden lighting at lower levels do not tend to give rise to issues. Light sources such as security type lighting can give rise to unwanted

light spilling onto other properties when not angled correctly. As this is an outline application no details regarding lighting has been submitted. This issue could be dealt with via condition to limit the location of external lighting and can also be assessed at reserved matters stage. Officials are content that this issue could be appropriately dealt with to ensure no adverse impact on residential amenity.

Storm run-off/flood risk

8.36 Concerns were raised within an objection letter regarding the impact of further hard standing and built development on the existing drainage system and the potential to result in the flooding of adjacent lands, requesting that a drainage report should be submitted to demonstrate that flooding on adjacent lands will not occur.

8.37 The application site is not located within an identified floodplain or area of surface water flooding or historical flooding. The agent has confirmed that the area of hardstanding created by the development is 966m^2. Therefore, the proposal would not exceed the thresholds for requiring the submission of a drainage assessment as per Policy FLD3 of PPS15. NI water have confirmed there is no surface water sewer within 20m of the site, however the applicant has confirmed that surface water will be disposed of via soakaway. The applicant owns the remainder of the field to the rear of the site and can therefore construct a suitable soakaway to ensure surface water is disposed of appropriately and directed away from the laneway. Additionally, DFI Roads have not raised any concerns regarding flooding/surface water flowing along the laneway.

8.38 Officials are satisfied that the proposal will not result in adverse impact on neighbouring lands from flooding.

Waste Water Disposal

8.39 The applicant has outlined that foul disposal is proposed via mains infrastructure. NI Water have confirmed that there is an existing foul sewer within 20m of the application site and that the receiving Waste Water Treatment Works has available capacity to receive the proposed development.

Representations

8.40 The issues raised in the letters of representation have been considered throughout the body of the Committee report from paragraphs 8.1 to 8.39.

9.0 CONCLUSION

9.1 The application site fails to meet with the principle planning policies as there is no substantial and continuously built up frontage at this location, and consequently no gap to infill as there are not the required amount of buildings either side of the application site to form a built up frontage. The development fails to reflect the character of the surrounding development. The proposal does not meet with any of the permissive circumstances for development in the countryside, and no over-riding reasons have been provided as to why development is necessary at this location. The application proposal will result in a suburban style build-up when viewed with existing and approved buildings and will result in the creation of ribbon development along the laneway. The proposal is subsequently contrary to Paragraphs 6.70, and 6.73 of the SPPS and Policies CTY1, CTY8, and CTY14 of PPS21. Refusal is recommended.

10.0 Reasons for Refusal

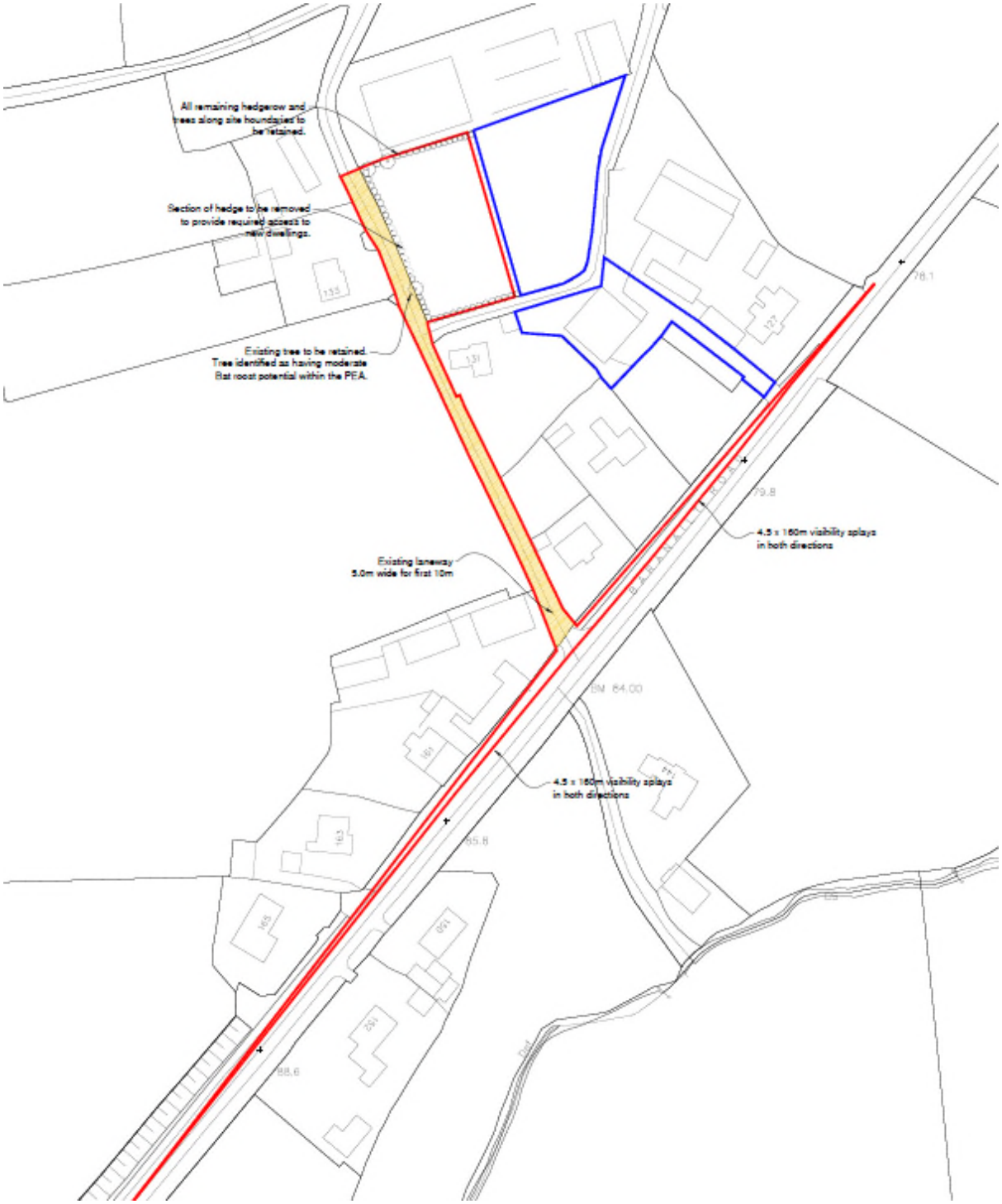
1. The proposal is contrary to Paragraph 6.73 of the Strategic Planning Policy Statement for Northern Ireland and Policy CTY1 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there are no overriding reasons why this development is essential in this rural location and could not be located within a settlement.

2. The proposal is contrary to paragraph 6.73 of the Strategic Planning Policy Statement for Northern Ireland and Policy CTY8 of Planning Policy Statement 21, Sustainable Development in the Countryside in that there is no substantial and continuously built up frontage at this location; there is no small gap which can accommodate a maximum of two dwellings, and the proposal

would, if permitted, result in the creation of ribbon development along the laneway.

3. The proposal is contrary to Paragraph 6.70 of the Strategic Planning Policy Statement for Northern Ireland and Policy CTY14 of Planning Policy Statement 21, Sustainable Development in the Countryside in that the building would, if permitted result in a suburban style build-up of development when viewed with existing and approved buildings; the building would, if permitted create a ribbon of development and would therefore result in a detrimental change to further erode the rural character of the countryside.

Site Location Map



Indicative Block Plan

Annex 1

Sent: 21 January 2022 22:26
To: Planning <Planning@causewaycoastandglens.gov.uk>
Subject: Planning referral request LA01/2020/0160/0

Can we ask that the application below be referred to the planning committee for the reasons detailed.
Many thanks
Alderman Alan Robinson
Alderman Mark Fielding.

LA01/2020/0160/0 - Proposed infill of existing gap site for 2no. dwellings with detached garage in accordance with CTY 8 of PPS21 at Lands North of 131 Baranailt Road Limavady.

The Planning department are stating the reason for refusal is that the development does not comply with the requirements of CTY 8 of PPS21. The departments reasoning is that they feel that the garage building at number 131 Baranailt Road, identified as building 2 on the concept drawing, does not contribute to the built-up frontage and therefore cannot be included as one of the 3 required buildings. Stated that; "*Buildings which are set back behind the primary frontage building and appear subordinate to the main building are not considered to contribute to the frontage*".

However PPS 21 Paragraph 5.33 clearly states that, "*A 'ribbon' does not necessarily have to be served by individual accesses nor have a continuous or uniform building line. Buildings sited back, staggered or at angles and with gaps between them can still represent ribbon development, if they have a common frontage or they are visually linked*".

The garage is a building set back and this is therefore acceptable under Paragraph 5.33 of PPS 21. The garage is also served from the same common frontage as the proposed development and number 131 so as such has the same common frontage and should therefore be considered as part of the built up frontage. Even if this was not the case the building is visually linked to 131Baranailt Road and as such can form part of the continuous built-up frontage as the working within the policy clearly states "**or**" visually linked.

Given that paragraph 5.33 clearly states that set back buildings that do not have individual accesses and are visually linked can contribute to the built-up frontage then the garage of 131 should be considered to contribute to the built-up frontage.

Sent from my iPad