

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

An Advisory Council to the Department of the Environment

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Reference E/2007/0075/F

Runkerry Development – Destination Resort and golf course.

CNCC wish to register their objection to this proposed development for a wide range of reasons which are set out below under the primary headings of Landscape and Nature Conservation.

Landscape

1. AONB The site lies within the Causeway Coast Area of Outstanding Natural Beauty, designated as one of Northern Ireland's most important landscapes. This is recognised in the planning system in the Regional Development Strategy *Shaping our Future* which states in Policy ENV1.4 'Protect, enhance and encourage appreciation of the Region's landscapes'. This is further developed with regard to AONBs by the statement 'Complete the designation of a suite of Areas of Outstanding Natural Beauty selected for the quality of their landscape, and manage so as to conserve their distinctive character, their nature conservation and built heritage interest'. The AONB Management Plan also sets out the following objectives:-

Objective B 'To ensure that any development which is permitted supports the purpose of the AONB and does not undermine the quality and special distinctiveness of the landscape as set out in the landscape character assessment.'

Objective E 'To ensure land-use planning and development decisions help to protect the landscape resource upon which most economic activity within the AONB is based'.

We believe that the scale and nature of this development not only do not fulfil any of these policies or objectives, but actively undermine them and are wholly inappropriate at this site.

2. Countryside Policy Area

The site also lies within a Countryside Policy Area, designated under the Draft Northern Area Plan. The strategic objectives of these planning policy areas are:

- to protect areas of countryside under pressure from development;
- to protect the visual amenity of areas of landscape quality;
- to maintain the rural character of the countryside

'There will therefore be a clear presumption in Green Belts and CPAs against any new building and against any new use of land, which might create a demand for more buildings, apart from a limited number of uses, which are in principle appropriate to a rural location. No other development will normally be allowed unless there are overriding reasons why that development is essential and could not be located in a town or village, or in a part of the open countryside not subject to policy constraint.'

More specifically, with regard to the Causeway Coast, the draft Northern Area Plan states in COU5 that the World Heritage Site's 'setting would therefore be protected from development of a scale and prominence which would diminish public enjoyment of the WHS'.

Once again we believe that because of its scale and prominence this development is directly counter to the objectives of the CPA and that there is no proven overriding reason why it must be developed at this location.

3. World Heritage Site Setting

The site lies within a very short distance of the Giant's Causeway World Heritage Site, which is the only such WHS in Northern Ireland, and our most important tourist and visitor attraction. The setting of the WHS has been considered of utmost importance and in the Management Plan (2005) this area has been included in the Causeway's Distinctive Landscape Setting. The Management Plan goes on to say 'For the Distinctive Landscape Setting of the WHS, further intensification of visible built development is likely to result in the degradation of the area's landscape character and degrade the quality of the visitor experience on the approach to the site'.

A further point is made in regard to Land Use: 'The current mixed-use farming regime in the setting of the Site creates a strong rural landscape character that is in keeping with its Outstanding Universal Value and scenic qualities. A significant shift away from this land management regime would adversely impact on the quality and nature of the Site's setting. 'This leads the Plan to Objective 23 - 'Encourage the protection of the setting of the Site to secure the overall integrity of the World Heritage Site'. This is to be achieved through actions including:

- '1. Ensure no inappropriate development in the setting of the Site
3. Encourage sensitive land management in the setting of the Site'

These aspects of the WHS Management Plan have been embodied in the draft Northern Area Plan

Designation COU 11 The Distinctive Landscape Setting of the Giant's

Causeway World Heritage Site

The Distinctive Landscape Setting of the Giant's Causeway World Heritage Site is designated as identified on the Countryside Maps.

Policy COU 12 The Distinctive Landscape Setting of the Giant's Causeway World Heritage Site.

No development within the Distinctive Landscape Setting outside of settlement development limits will be approved except:

1. exceptionally modest scale facilities, without landscape detriment, which are necessary to meet the direct needs of visitors to the World Heritage Site;
2. extensions to dwellings that are appropriate in scale and design and represent not more than 20% of the cubic content of existing dwellings;
3. replacements of existing occupied dwellings with not more than a 20% increase in the cubic content.

Development proposals within the Distinctive Landscape Setting of the Giant's Causeway World Heritage Site will be subject to particular scrutiny. The Department considers 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, rather than a facility to meet the needs of visitors to the general area. 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. The Distinctive Landscape is located within the Causeway Coast AONB, where sensitive development is required.

The relationship of this landscape to the World Heritage Site requires an even stricter approach to development proposals than elsewhere in the AONB, to ensure the balance between landscape and built form is not adversely affected with buildings appearing over-dominant and out of historic context. The Department, therefore, imposes restrictions on the scale of extensions and replacement dwellings to avoid this arising. The Department will seek improvements to the landscape setting where these are appropriate, and are related to the development proposed.

The guidance given here with regard to development within the Distinctive Landscape Setting is quite clear, and we believe that the proposed development does not follow it in any way. It is not small in scale, is not directly related to the World Heritage Site or require a location in proximity to it. It is however a facility designed to meet the needs of certain visitors (principally golfers) to the general area, and to exploit the wonderful setting of the World Heritage Site while detracting from it.

Designation of World Heritage Sites is the concern of UNESCO, who have already expressed concern about inappropriate development in the setting of the Giant's Causeway. We would wish to see their views taken into account in any consideration of this planning application, and are surprised that they do not appear to have been consulted. We believe that if this development is granted planning permission the status of the World Heritage Site could be put at risk.

4. Planning Strategy for Rural Northern Ireland/Draft Planning Policy 16 – Tourism

The Planning Strategy for Rural Northern Ireland sets out clear policies for the coastal area in its Policy CO 1 The Undeveloped Coast.

To conserve the natural character and landscape of the undeveloped coast.

It has long been recognised that the Northern Ireland coastline with its diversity of landscapes and habitats, some of outstanding quality, is a very important but non-renewable resource. Already much of the coast has been designated within Areas of Outstanding Natural Beauty, Areas of Special Scientific Interest, Nature Reserves or falls within existing rural policy areas. The effect of development on both wildlife and the beauty of the landscape can be serious and widespread. There are few types of development which require a coastal location and the undeveloped coast will rarely be an appropriate location for new development.

The undeveloped coastal zone will therefore be designated as a Countryside Policy Area in relevant development plans. It shall be taken to include those areas directly related to the coastline and including river estuaries. The shoreline of Strangford Lough is included within the definition of the coast. Certain stretches of shoreline of inland lakes and loughs may also be designated as a Countryside Policy Area. Such designations will be set out in the relevant area plan and will be based on the Countryside Assessment for the particular area.

Within the coastal Countryside Policy Area the Department will apply the policies as set out in the Green Belt and Countryside Policy Areas section. However, greater emphasis will be placed on the visual impact of proposals on the coastal zone. In general development will only be permitted where there is a clear site specific need.

Certain parts of the coast are, for a variety of reasons, of such unique quality that it would be in the public interest to restrict all development. This policy will only be applied in exceptional circumstances and such areas will be identified in development plans.

Particular attention will be paid to the maintenance of public views to the coast.

Exceptionally, development may be permitted on the undeveloped coast in the following circumstances:

- where the proposed development is of such national or regional importance as to outweigh any potential detrimental impact to the coastal environment; and
- where no feasible alternative site within an existing urban area exists.

(Our underlining of text as being of particular relevance)

We do not consider a golf resort to be of sufficient national or regional importance to outweigh the detrimental impact in the setting of the iconic Giant's Causeway World Heritage Site.

This policy is currently being reviewed by draft PPS16 Tourism (insofar as it relates to tourism development or the protection of tourism assets from inappropriate development). This PPS is currently under Public Consultation, but we consider it to be relevant in these circumstances, particularly TSM 1 Safeguarding of Tourism Assets.

The site also lies next to the Bushfoot Dunes ASSI which would be vulnerable to disturbance and changes in the hydrology as a result of construction work, landscaping and drainage. The protection of ASSIs is covered by various pieces of legislation, including the Environment Order and the Nature Conservation and Amenity Lands Order, and also the Regional development strategy for Northern Ireland. This states in Policy ENV 1.2 that there is a need to 'Protect and manage areas designated for their scientific interest', and specifically mentions both SLNCIs and ASSIs.

Apart from the SLNCI at the northern end of the site there is an area of flooded meadow that is highlighted in the Environmental Statement as being of wildlife interest. Yet this is the exact site for the Golf Clubhouse development, which will involve draining and excavating the whole area. While there is a proposal to create a new pond close to the Clubhouse it will be a different habitat with no relationship to the existing wild habitat.

CNCC is also concerned about the bat colonies that use this site extensively for foraging, as shown by the ES. While it is clear that there is an intention to retain many of the important trees on the site and to plant some additional tree cover, we would have concerns about the level of disturbance caused by human activity, and particularly by the light pollution that will inevitably be caused by the urban-style development of much of the site, particularly the area closest to the bat roosts within the Dunderave Estate.

Finally we would take issue with the statement in the ES 'It is anticipated that the residual ecological impact of the proposed development will be a net increase in biodiversity and nature conservation interest on the application site'. There is no evidence that this is likely to be the case, with a significant area becoming urbanised and the remainder being managed and used as a golf course. Our experience of golf course management, with its regime of constant mowing of fairways and short rough and no grazing of coarser rough, suggests that biodiversity will be extremely low on this site if the development goes ahead.

Taking all these factors into consideration CNCC believes that there is an overwhelming case for refusing planning permission for this proposed development. We hope that those who find themselves making decisions on this proposal are fully aware of their custodial duty for our most special landscapes, not just for us now, but for future generations, and in this case not just for Northern Ireland, but for the whole world – signing up to the World Heritage Convention does not just involve taking advantage of the WHS brand, but also facing up to important responsibilities of care and protection. Failing in those responsibilities will have serious consequences for us all.

Yours sincerely



Peter Archdale
Deputy Chairman