

# **COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE**

## **An Advisory Council to the Department of the Environment**

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Mr Michael Francey,  
PPS16 – Tourism – Public Consultation,  
Department of the Environment,  
Planning Policy Division,  
Millennium House,  
17-25 Great Victoria Street,  
BELFAST  
BT2 7BN

Dear Mr. Francey,

### **Public Consultation - Draft PPS16 Tourism**

CNCC welcomes the opportunity to comment on this draft Planning Policy Statement. We have a number of comments to make on the individual policies in the PPS which are set out below.

#### **TSM 1**

CNCC strongly welcomes this clear statement that protects the visual setting of tourism assets, and believe that this does effectively complement other existing protection measures including designations, planning policies and development plans.

#### **TSM 2**

CNCC again welcomes this policy of refocusing tourism development on settlements, and the clear signals with regard to scale and size and design.

#### **TSM 3**

CNCC welcomes the setting out of the various relevant policies in various PPSs which will govern the consideration of proposals for tourism development in the countryside. We would express one concern over the re-use of rural buildings (paragraph 6.8), where we believe that a problem might arise where most agricultural buildings have never received planning permission. We believe that this issue should be clarified.

#### **TSM 5**

CNCC has concerns about the definition of the term 'outside' as in '.. outside a Village or Smaller Rural Settlement'. This could cover a wide range of interpretations and we would prefer to see a more exact definition or the use of a different term. The implication of the text is that the development should be on the periphery of the settlement, but if so this should be stated explicitly.

We are not convinced that arguments about change of use should be considered here; there are so many other issues involved. It should also be recognised that hotels are not only a tourist facility, but may play important roles in local communities as well.

Our major concern about this policy and those that follow it is the lack of discussion about sustainability, with particular regard to access and services: water, waste disposal, power, telecommunications and particularly sewage disposal. While these are covered to varying degrees in PPS 21 we would like to see explicit reference to CTY 16 in this section, making clear that unless the development complies with its conditions it will not be granted planning permission.

**TSM 6**

The comments in the last paragraph above apply equally here.

**TSM 7**

The comments above on sewerage and water quality apply most particularly here. The experience of the large site at Benone where the caravan park has (in conjunction with the prison and the visitor centre) completely overwhelmed the capacity of the available treatment is not one that we would wish to see repeated again. We are convinced of the need for explicit reference to sewage disposal and water quality in this PPS.

**TSM 8**

CNCC welcomes all of the criteria laid out here, but is again surprised by the omission of any reference to water quality or sewage treatment and disposal when flood-lighting, security fencing and run-off are specifically mentioned. While our concerns might be covered by references to adversely affecting 'features of the natural or built heritage' or 'any emission or effluent' we would prefer to see an explicit reference.

Yours sincerely

A handwritten signature in black ink, appearing to read "Patrick Casement", written over a horizontal line.

**Patrick Casement**  
Chairman