

# Supporting Statement

Coastal Defence Works,  
Bann Estuary,  
Lands north of 53 Cranagh Road.  
Portstewart.



February 2025

Ref. C05052

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## 1.0 Background

1.1 This Supporting Statement has been prepared in respect of an application for full planning permission for the development of sea defences to the railway line between Castlerock and Coleraine. It deals primarily with the design and layout of the development proposed.

1.2 This application represents a development necessary to protect the railway line and corresponding infrastructure from erosion, in the interest of health and safety requirements.

## 2.0 Site and Surrounding Area

2.1 The application site measures c. 0.74ha and is located on lands approximately 400m north of 53 Cranagh Road. The Cranagh Road runs from the south west to the south east of the site. The northern boundary of the site forms part of the bank to the River Bann (Fig. 1). The site encompasses a section of the railway line. The northern boundary borders onto the River Bann estuary. Land to the south consists of grasslands and a wooded area, beyond which is predominantly farmland with associated and farm buildings and dwellings at 47, 51 and 53 Cranagh Road.

2.2 At present, there is one revetment on the site however, an assumed length of 10 meters has been displaced.



*Figure 1 – Site location*



**Figure 2 – Site location**



**Figure 3 – Site location**

### **3.0 Planning History**

3.1 A desktop planning history search identified no recent planning history on the application site or in the wider area.

### **4.0 The Proposed Development**

4.1 The proposed development is for full planning permission for the provision of sea defences alongside the railway line, to include the formulation of two revetments separated by a grass headland in the middle of the site. The first of which proposed will tie into the existing culvert structure and revetment, the second will form a new revetment, split into two sections to accommodate the grass headland.

4.2 The proposed design and layout of the proposed development is required to promote the protection of the railway line from coastal flooding and erosion in the location

specified. The proposed development will support transport infrastructure and ensure the longevity of a sustainable mode of public transport in the area. The site layout plan (Fig. 4) demonstrates the scale and location of the proposed scheme in relation to the railway line and the River Bann estuary.



**Figure 4** – Excerpt from proposed site plan.

4.3 The temporary works compound will be located off a laneway that connects into the bend where the Cranagh Road meets the Ballywoolen Road (Fig's 4, 5 and 6). This laneway provides access to the railway line, allowing materials/plant to be transported via road to the temporary works compound and then transferred onto rail stock from which works to the embankment can take place. The works area itself is located approximately 800m from the access point, is proposed to be accessed via the railway or from the estuary bed. Land used to form the temporary works compound will be restored to its original state following completion of the works (Fig 6). The temporary compound would benefit from Permitted Development under the Permitted Development Order Part 5 'Temporary Buildings and Uses'. As such, it is located outside the application site.



**Figure 5** – Image of site access



*Figure 6 – Site Access arrangements*

- 4.4 Proposed works: 14C2 – new rip rap revetment between Chainages 115-135 (282020E, 434822N to 282001E, 434931N) and newly enhanced rip rap revetment between Chainages 135-290 (282001E, 434931N to 281860E, 434997N) (Fig 7). The revetment will tie into the existing rip rap revetment at both ends. The revetment will be split into 2no. sections to accommodate the grassed headland between these Chainages. All new revetments will be formed in a double interlocking primary rip rap layer (60-300kg) with a geotextile beneath the rip rap.
- 4.5 The proposed works have been designed to protect against coastal erosion on the seaward rail embankment face due to wave action and extreme sea water levels.
- 4.6 The following anticipated sequence of construction was considered for the design:
1. Import new primary layer rock.
  2. Re-establish a consistent profile of the existing embankment face to act as a suitable formation for the new rock armour. Excavation into the face of the existing embankment will be minimised. Surface vegetation will be removed. Displaced existing revetment stone will be removed. Notable undulations in the existing surface of the embankment will be filled with engineered fill. Naturally accreted material at the toe of the embankment will be removed. Material will be excavated at the toe of the existing embankment, as a continuation of the existing embankment profile, in preparation for the new rip rap revetment toe.
  3. Geotextile will be placed along this new profile.
  4. Place new stockpiled rip rap in a double-interlocking primary rock layer as per design. Note: Bay width will be subject to extent of works on a site-by-site basis and will depend on duration on work shifts. It is anticipated that the works will be constructed in bays such that the permanent works rip rap will be placed over the geotextile at the end of each working shift. This should be placed such that overlaps in the geotextile are allowed for between bay widths.
  5. Plant access will either from the rail line, foreshore, or a combination of the two.
  6. The rip rap revetment will be constructed from the toe, working up the slope.







## 5.0 Local Development Plan Context

5.1 Section 45 (1) of the Planning Act (Northern Ireland) 2011 requires that the planning authority, when dealing with an application, has regard to the local development plan so far as it is material to the application, and to any other material considerations.

5.2 Section 6(4) of the Planning Act (NI) 2011 also states that determinations must be made in accordance with the local development plan unless material considerations indicate otherwise. The extant local development plan is the Northern Area Plan 2016.

5.3 Within the relevant area plan (Northern Area Plan 2016), the subject site is located within an area of environmental sensitivity, designations are as follows:

- Binevenagh Area of Natural Beauty (ANOB)
- Bann Estuary Special Area of Conservation (SAC)
- Bann Estuary Area of Special Scientific Interest (ASSI)

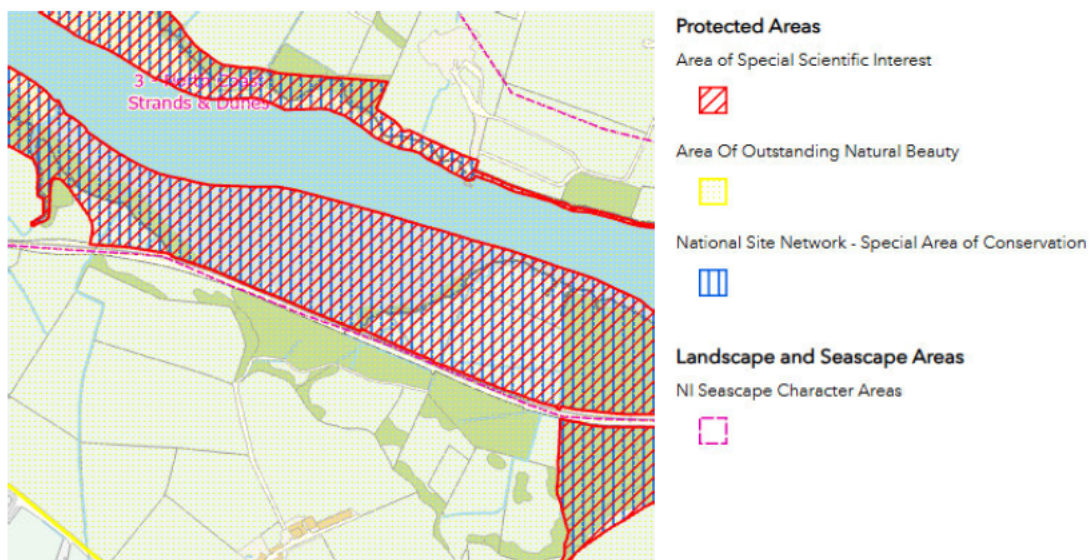


Figure 11 –NIEA Natural Environment Map

## 6.0 Regional Policy Context and Assessment

### Regional Development Strategy (2035)

6.1 The Regional Development Strategy (RDS) encourages development that will promote transport which balances the needs of our environment, society and economy. Objective (SPG-TRAN 1) highlights the importance to upgrading of public transport services.

### Strategic Planning Policy Statement (SPPS)

6.2 The SPPS was published by the Department of the Environment in September 2015. The provisions of the SPPS apply to the whole of Northern Ireland and are material to all decisions on individual planning applications and appeals. The SPPS promotes good

design which it states is an important material consideration in the assessment of all proposals.

- 6.3 The SPPS encourages design that will respond sympathetically to the characteristics of the site namely, archaeological heritage; the form of the land, its contours and views to and from the site; and the existing natural heritage and protect or create appropriate conditions for flora and fauna to thrive.

*Planning Policy Statements (Retained Policy)*

- 6.4 The following PPSs are also relevant to the proposal:

- PPS 2: Natural Heritage;
- PPS 6: Planning, Archaeology and the Built Heritage;
- PPS 15: Planning and Flood Risk (Revised).

- 6.6 The proposed development is considered against these regional policies in the sections below.

***PPS 2: Natural Heritage***

- 6.7 PPS 2 sets out the Departments planning policies for the conservation, protection and enhancement of our natural heritage. It contains policies relating to European and Ramsar sites (policy NH 1), species protected by law (policy NH2), sites of nature conservation importance (policy NH 3), habitats, species or features of natural heritage importance (NH5) and Areas of Outstanding Natural Beauty (NH6).

- 6.8 Designated in 2006, Binevenagh AONB covers the area between the Roe Estuary and Magilligan, the cliffs of Binevenagh, the Bann Estuary and Portstewart sand dunes. Much of the landscape of the Binevenagh AONB is characterised by long beaches and extensive dune systems. The Bann Estuary is also an important site, rich with special habitats and important for the wide range of different plants and invertebrate species they support. The Estuary is also designated as a Special Area of Conservation (SAC) and an Area of Special Scientific Interest (ASSI).

- 6.9 The Preliminary Ecological Appraisal (PEA) confirms that the site and surrounding area supports a range of habitats including grassland, scrub, scattered trees, reedbed, running water associated with the Lower Bann River, and coastal defence structures, with the works area located adjacent to the Bann Estuary SAC/ASSI and hydrologically connected to downstream European designations. No invasive plant species were recorded, and while no bat roosts or badger setts were identified, the site is assessed as moderately suitable for bat commuting and foraging, optimal for breeding birds within scrub and scattered trees, suitable for badger activity, and suitable for otter commuting associated with the Lower Bann River. The river itself was assessed as optimal habitat for fisheries and suitable for marine mammals, including pinnipeds and cetaceans. The Construction Environmental Management Plan (CEMP) provided outlines mitigation measures which will be utilised to negate any potential impacts. The

CEMP recommends the preparation and implementation of a incorporating pollution prevention measures and adherence to GPP5 for works in or near water, avoidance of vegetation clearance during the bird breeding season or the use of pre-construction nesting checks, safeguarding measures for commuting mammals such as bats and otters, consultation with DAERA and NIEA in relation to fisheries, marine licensing and designated sites, and, where possible, relocation of the site compound outside Local Wildlife Sites to avoid impacts on sensitive habitats

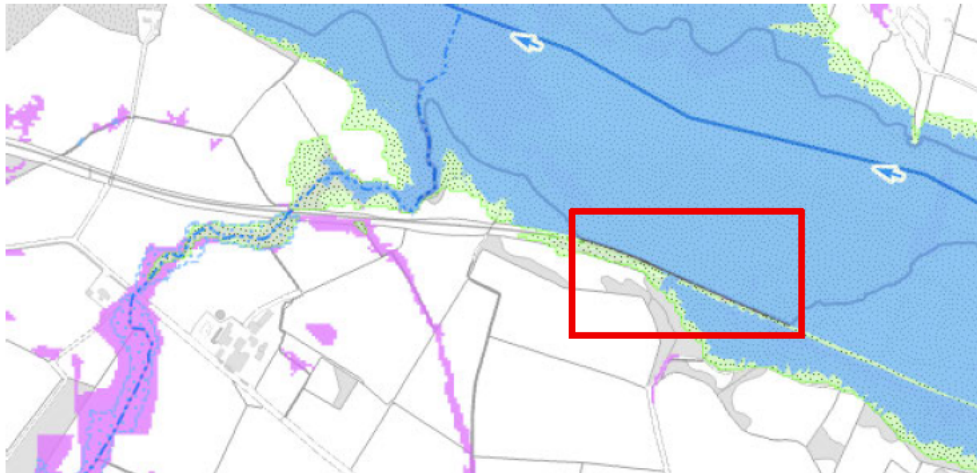
6.10 The above proposed mitigation measures will ensure that the proposal complies with the relevant policies of PPS2. Given the findings from the Preliminary Ecological Appraisal, the conclusions against the policy requirements are as follows:

- Policy NH 1 - The proposal is not likely to have a significant impact on the Special Area of Conservation.
- Policy NH 2 - The proposal is not likely to harm any European protected species.
- Policy NH 3 – The proposal is not likely to have an adverse effect on the integrity, including the value of the site to the habitat network, or special interest of the Area of Special Scientific Interest.
- Policy NH 5 - The proposal will not result in an unacceptable adverse impact on priority habitats or species.
- Policy NH 6 – The proposal is subservient in its size and scale and sensitive in its design to the immediate surrounding area and wider area of outstanding natural beauty.

In conclusion, the proposal fully complies with all relevant policy requirements of PPS2.

***PPS15 Planning and Flood Risk (Revised)***

6.11 PPS15 (Revised) sets out the Department’s planning policies to minimise and manage flood risk to people, property and the environment. Fig 12 shows that the site is located within both fluvial and coastal flood plains. Policy FLD 1 prohibits development within the 1 in 100 year fluvial flood plain or the 1 in 200 year coastal flood plain unless the proposed development qualifies for one of the exceptions listed. Given that an element of the proposed development is for the construction of new sea defences in an undefended area to protect transport infrastructure, it is concluded that this element of the application is subject to the exemption put forward in part D of FLD 1. For the element of the site that where works are to upgrade an existing revetment, Policy FLD 1 Development in Fluvial (River) and Coastal Flood Plains, considers works to upgrade existing flood defences appropriate and will generally be considered acceptable for development. In conclusion, the proposed development is in accordance with the requirements of Policy FLD 1.



*Figure 12 – Flood map*

Key:

Blue: Present day – floodplain rivers (1 in 100 year)

Green: Present day – floodplain sea (1 in 200 year)

Purple: Present day – surface water (1 in 200 year)

## 7.0 Conclusions

- 7.1 This PD&AS demonstrates how the proposal has developed to take account of the site assets and constraints. It has been developed cognisant of the prevailing planning policy framework to ensure that the proposal is designed in an appropriate manner to take account of the site, its setting and, local heritage context both natural and archaeological, in order to provide a suitable flood defence scheme.
- 7.2 The planning application is also accompanied by a suite of drawings and a number of technical reports to address all the relevant design and technical matters required as part of the planning application submission.
- 7.3 Overall, it is submitted that the proposed development satisfies all the planning considerations to include policy, design and technical matters and should be granted planning approval.