

Submitted to **Local Development Plan 2030 - Draft Plan Strategy Representations**
Submitted on **2019-09-14 12:17:01**

SECTION A - DATA PROTECTION AND CONSENT

Please tick to confirm that you have read and understood the Council's Local Development Plan Privacy Notice.

I confirm that I have read and understood the Local Development Plan Privacy Notice and I give my consent for Antrim and Newtownabbey Borough Council to hold my personal data for the purposes outlined.:

Yes

SECTION B - CONTACT DETAILS

Please specify if you are responding as an individual, as an organisation, or as an agent acting on behalf of an individual, group or organisation?

Respondent Type:

Individual

Please specify your contact details:

Title:

Mr

First name:

GARETH

Last name:

KELLY

Job Title (where relevant):

Farmer

Organisation Name (where relevant):

GARETH KELLY

Agent Name (If applicable):

Client Name (If applicable):

Address:

ROUGHFORT HOUSE
12 LYLEHILL ROAD EAST
TEMPLEPATRICK

Postcode (please enter your full postcode):

BT39 0HQ

Telephone number:

What is your email address?

Email:

Please Read Before Continuing. . .

SECTION C - REPRESENTATIONS

Do you consider the draft Plan Strategy to be **SOUND** or **UNSOUND**?

I consider it to be 'Unsound'

Unsound Representation

Please identify which section of the draft Plan Strategy you consider to be **UNSOUND**:

Paragraph Number in Document:

1.1, 4.1, 4.2, 4.4, 4.6, 4.7, 4.8, 4.9, 7.13, &7.14

Policy Heading:

Sustainable Development

Strategic Policy (SP) Paragraph Number:

SP 4.4

Detailed Management Policy (DM) Paragraph Number:

DM 17.1 A-G

Page Number In Document:

62-68

Proposal Map (If relevant state location):

Roughfort - Maps will be supplied separately

Under which test(s) of soundness do you consider this to be UNSOUND:

P2 - Has the Council prepared its Preferred Options Paper and taken into account any representations made?, C2 - Did the Council take account of its Community Plan?, C3 - Did the Council take account of policy and guidance issued by the Department?, C4 - Has the DPD had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?, CE1 – Does the DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross-boundary issues are relevant it is not in conflict with the DPD's of neighbouring Councils?, CE2 - Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?, CE4 - Is it reasonably flexible to enable it to deal with changing circumstances?

Please give details why you consider the draft Plan Strategy to be UNSOUND having regard to the test(s) you have identified above.

Unsound Justification:

Roughfort House

12 Lylehill Road East

Templepatrick

Ballyclare

Co Antrim. BT39 0HQ

Date:

Dear Sir/Madam,

RE: Request for oral hearing – Draft Planning Strategy – Antrim And Newtownabbey Council

I formally give my representation as I consider the Draft Planning Strategy to be unsound. I refer to the soundness tests and don't consider them to be met with the planning process under sustainable development in reference to page 62 sub paragraphs 1.1, 4.1, 4.2, 4.4, 4.6, 4.7, 4.8, 4.9. MD17.1 A – G. Nor do I consider pages 62 – 68 in the draft plan strategy to be implemented.

It would appear the planners are intending to spread some 9,750 potential homes across the Boroughs of Antrim and Newtownabbey in sporadic brown field sites. In this context it is my submission that the Planning Authorities have not met their own strategic policies above by building houses of similarity in these sites and missing the opportunity of a generation.

If the planners were to take their own criteria and put it in a Flag Ship development project with mixed use development with integration of the community, then Roughfort has been a missed opportunity with infrastructure to support development of such a concept. There is a key transportation corridor provided by the Metro bus service between Roughfort terminus and Belfast city centre. It also has Northern Ireland Electricity installation, natural gas, sewage system and drainage system in place. It has a 48 inch water main on site.

This is very much an English concept in bringing together all of the aspects of the Draft Plan Strategy in to the Flag Ship development with Roughfort's unutilised infrastructure already in place.

Over the coming years as the planning process evolves and an opportunity were to arise on how to take this concept forward to enable its enhancement or reduction form. A retirement village concept rather than a hotel and amenities centre would enhance the Boroughs of Antrim and Newtownabbey in delivering citizens a sense of community in later life. With an ever increasing older generation, this would ensure an independent lifestyle with the potential to maximise the years ahead and provide friendships, a sense of community and social life.

As the elderly would move to the Retirement village this would provide a greater opportunity for the next generation to get onto the housing ladder. Roughfort could facilitate such a concept plan in mature surroundings. The concept of a Retirement Village also has the opportunity to create jobs in the Antrim and Newtownabbey area, something which will not happen to any degree if the planning authorities continue with the sporadic house building in brown field sites. If the planners were to develop such a site incorporating all of the aspects, it would be the first of the nine super councils to truly meet the criteria they produced. Maps and additional information attached together with a letter of support from Phoenix Gas and still waiting response from the Northern Ireland Federation of Housing.

I now ask the commission for an oral hearing in respect of the above.

Yours sincerely

Mr H J Gareth Kelly

Upload File:

Phoenix Gas Roughfort Development.pdf was uploaded

Modifications

If you consider the draft Plan Strategy to be 'UNSOUND', please provide details of what, if any, modifications do you think should be made to the section, policy or proposal which your representation relates to? What specific modifications do you think should be made in order to address your representation? Please briefly state how your proposed alternative would meet the requirements of the Sustainability Appraisal and other published assessments.

Modifications:

Having attended a meeting where it was suggested that in real terms there were only 750 additional new homes required I would like to seek the commissioners clarification on how the housing growth allocation table (page 135 table 6) was compiled.

The commissers should ask the planning auhtorites to withdraw the planning consents on dorment sites throughout the borough and reallocate where there is infrastructure and employment.

The current concept that the planning authorities have of building dissimilar houses in terms of value does not tick the coalescence box that the planning authorities desire. Infact it has more chance of creating division as this could cause intentional negative equity. The only successful way to tick the coalescence box is to build simultaneously whereby everyone sees what they get for their money from the outset.

It would appear that the planning authorities have forgotten about the forth stage of life. The Roughfort concept plan includes all stages of life as it also has a retirement village to enhance the latter stages. The Forward Planning team make no mention of this in their Draugh Plan Strategy.

File Upload:

No file was uploaded

If you are seeking a modification to the draft Plan Strategy, please indicate how you would like your representation to be dealt with at Independent Examination:

Oral Hearing

Would you like to submit another representation?

No



26.8.19

To whom it may concern

RE: Roughfort Development, Mallusk

The developer for the above site would like to utilise natural gas for his proposed development and Phoenix have existing gas mains in close proximity to the entrance of the site.

Natural Gas is clean, affordable, efficient and controllable. Property owners can use it to heat their homes, have instant hot water just by turning on a tap, cooking and gas tumble drying.

In the Phoenix License area 98% of all new homes in the natural gas supply area use natural gas. Indeed in a recent market survey over 98% of our customers would recommend natural gas to friends or family. (*100 people independently surveyed and chosen at random in April 2019).

Phoenix was established in 1996 to bring natural gas to the Greater Belfast area of Northern Ireland, where there was previously no natural gas distribution network.

Since 1996 local, national and international partnerships have delivered an investment of over £500 million into the Northern Ireland economy and the wider natural gas industry now provides employment to over 3,000 people. We continue to invest in infrastructure that currently has in excess of 220,000 domestic and business customers connected, and continues to grow at around 8,000 new customers each year.

We are the owner and operator of the largest gas distribution business in Northern Ireland, covering an area that encapsulates almost half of the population of Northern Ireland, including Greater Belfast, Larne and a recent extension into East Down. Our gas distribution network currently comprises c.3,800 kilometres of intermediate, medium and low pressure mains, making gas available to c.350,000 potential properties of which, more than 220,000 are already connected. PNG is responsible for developing and maintaining the pipeline network and providing a 24/7 operational and transportation service platform to both gas suppliers and gas consumers.

Natural gas is already used in all of the new housing developments in the Mallusk area and it would be great to get more connections in a more rural part of the Mallusk wider area where we have already invested in laying mains

Kind regards

Eunice McClune
New Build Sales Manager
Phoenix Natural Gas

Roughfort

Angie Armstrong <Angie.Armstrong@clanmil.org.uk>

16 September 2019 at
11:17

To: Gareth Kelly

Morning Gareth,

Thank you for the email, as per our conversation last week, Clanmil are waiting to hear back from the NIHE.

We will let you know as soon as we hear anything.

Kind regards,

Angie

Angie Armstrong

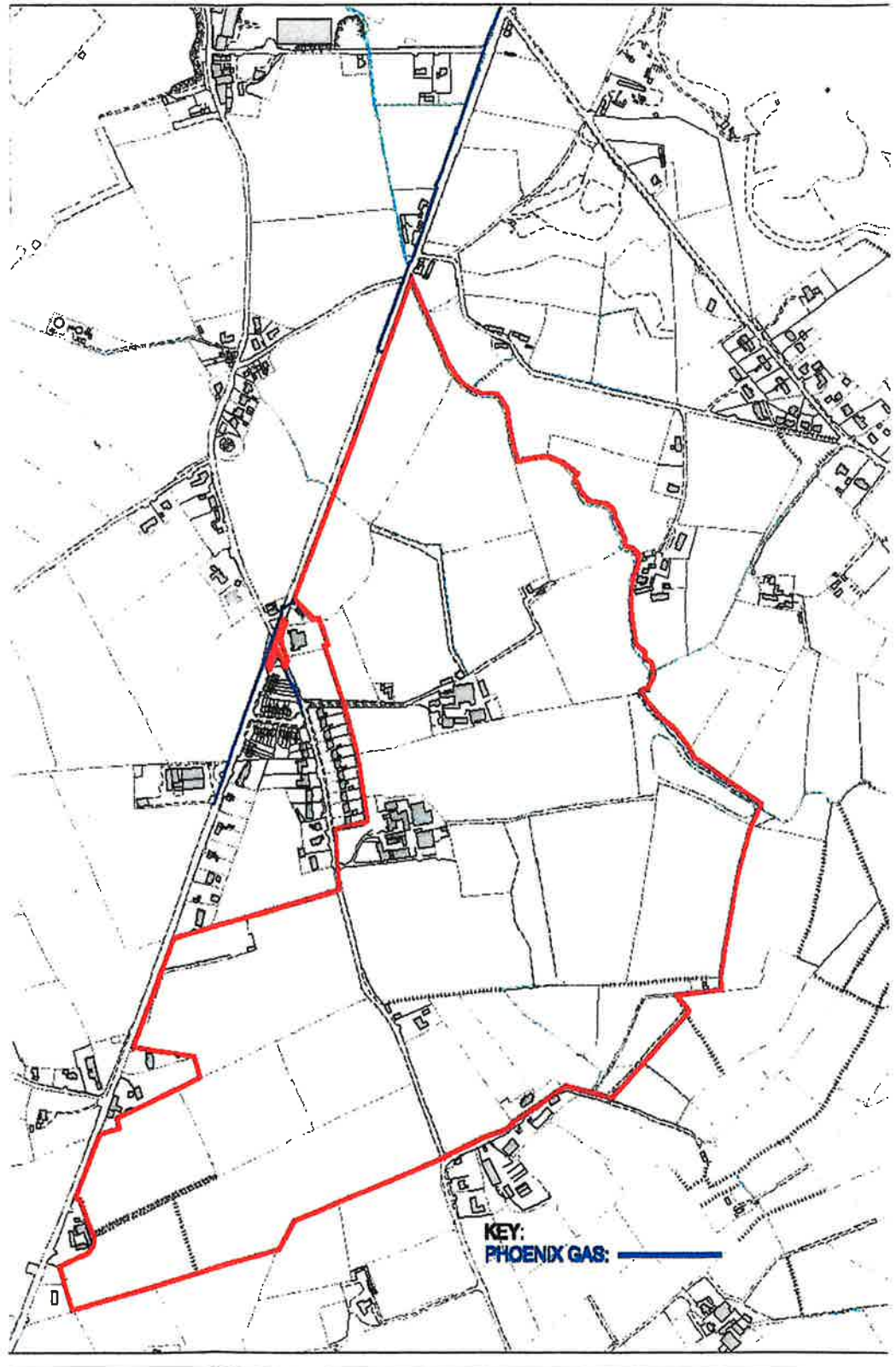
Development Officer

Angie.Armstrong@clanmil.org.uk

02890876018

www.clanmil.org.uk

1D ANON - 3WQE - DUPW - 2



LA03/DPS/0024
Gareth Kelly



LA03/DPS/0024
Gareth Kelly

