
Consultation Period

Antrim and Newtownabbey Borough Council has published its draft Plan Strategy, the first formal stage of the new Local Development Plan 2030, for public consultation.

The draft Plan Strategy is the first of two documents, which comprise the Local Development Plan 2030. It has been developed following extensive engagement with the public, stakeholders and our elected Members, including the publication of our Preferred Options Paper.

The draft Plan Strategy sets out how our Borough will grow and change up to the year 2030. It puts forward our Plan Vision for the future. It also contains a Spatial Growth Strategy indicating at a strategic level where growth should go in the Borough. It also sets out a range of Strategic Policies and Detailed Management Policies, which together will guide future planning decisions.

The draft Plan Strategy is published for formal public consultation over an 8-week period and the Council is inviting the submissions of representations, beginning on **Friday 26 July and closing on Friday 20 September 2019 at 5pm.**

The submission of representations in relation to the Council's draft Plan Strategy provides an opportunity for the public to influence the policies and proposals for the future planning and development within Antrim and Newtownabbey.

Please note that representations received after the closing period will not be accepted and will be subsequently returned.

Published alongside the draft Plan Strategy are a range of assessments including Sustainability Appraisal (incorporating the Strategic Environmental Assessment), a draft Habitats Regulation Assessment and an Equality (Section 75) Screening and Rural Needs Impact Assessment Report. These assessments are also subject to public consultation during the formal public consultation period closing on Friday 20 September 2019 at 5pm.

Copies of the draft Plan Strategy and all supporting documents are available to view and download from our website at:

www.antrimandnewtownabbey.gov.uk/draftplanstrategy.

Copies of all documents are also available for inspection at the Council Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8.30am to 5pm. Hard copies of the draft Plan Strategy are also available upon request.

Planning Section
RECEIVED

29 AUG 2019

File No.

Soundness Testing

A key feature of Northern Ireland's new Planning System is 'Soundness' which requires the draft Plan Strategy document to be tested at Independent Examination (IE) in terms of content, conformity and the process by which it has been prepared. Derived from established practices in England and Wales, it is considered that 'Soundness' testing will provide a more effective basis for examining Local Development Plans and consequently contribute towards a shorter IE process.

The purpose of the IE is to determine if the draft Plan Strategy satisfies statutory requirements and is 'sound'. The presumption will be that the draft Plan Strategy is 'sound' unless it is shown to be otherwise as a result of evidence considered at the IE stage.

The tests of soundness are based upon three categories which relate to how the draft Plan Strategy has been produced, the alignment of the document with central government regional plans, policy and guidance and the coherence, consistency and effectiveness of the content of the draft Plan Strategy. The tests of soundness are set out below:

Procedural Tests	
P1	Has the DPD* been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
P2	Has the Council prepared its Preferred Options Paper and taken into account any representations made?
P3	Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?
P4	Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
Consistency Tests	
C1	Did the Council take account of the Regional Development Strategy?
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 Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining Council's district?
Coherence and Effectiveness Tests	
CE1	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 DPDs of neighbouring Councils.



CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.
*Development Plan Document (DPD) – Comprises of the draft Plan Strategy	

Further information on Soundness can be found in Development Plan Practice Notes published by the Department for Infrastructure (DfI). Of particular relevance is Practice Note 6 'Soundness' (Version 2) and Practice Note 9 'Submission and Handling of Representations', both are available to view at <https://www.infrastructure-ni.gov.uk/publications/development-plan-practice-notes>.

In addition, the Planning Appeals Commission has also produced guidance entitled 'Procedures for Independent Examination of Local Development Plans' available at <https://www.pacni.gov.uk/procedural-guides>.

Making a Representation

As the main purpose of the IE is to determine whether the Development Plan Document (DPD) is 'sound', any person(s) wishing to make a representation to any part of the Plan should do so on the grounds of soundness. Any representation proposing a change to the Plan must demonstrate why the document is not sound having regard to the tests of soundness. Every representation should say precisely how the Plan should be changed in order to achieve soundness and should be supported, succinctly, by all the evidence thought necessary to justify the proposed change. Once the public consultation period has closed, **there will be no further opportunity to submit information unless the Commissioner requests it.**

Where several people share a common view on how the draft Plan Strategy should be changed, we encourage you to co-operate with each other, pool resources and make a single representation, for example, a local community group.

Those who make representations to the draft Plan Strategy should state whether they wish to have their representation considered at IE in writing or as an oral hearing. Unless people specifically request an oral hearing, the Commission will proceed on the basis that you are content that your representation will be considered in writing. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orally or in written form.



Points to Remember:

- Representations will be made publicly available for inspection at the Council's Offices and online for counter-representations;
- Complete all relevant sections of the response form;
- Clearly state why you consider the draft Plan Strategy to be 'unsound', having regard to the soundness tests;
- There will be no further opportunity to submit information once the public consultation period closes unless the Commissioner requests it;
- We would encourage you to submit separate forms for each representation you wish to submit;
- Every representation should say precisely how the draft Plan Strategy should be changed in order to achieve soundness;
- Representations should be supported, succinctly, by all the evidence thought necessary to justify the proposed change; and
- Clearly, state whether you wish for your representation to be heard orally or in writing.

Submitting Your Representation

We recommend that you submit your representation via our on-line consultation hub, at www.antrimandnewtownabbey.gov.uk/consultations, as this is the most efficient way to make a representation.

However, you can make a representation by completing this form and returning to us by **5pm on Friday 20 September 2019** either by email or by post.

Representations received after the closing period will not be accepted and will be subsequently returned.

What Happens Next

When the consultation has closed, the Forward Planning Team will collate the representations received and as soon as reasonably practicable, publish these online for a further 8-week period of consultation to allow counter-objections to be made. The representations will also be available for public inspection during this period at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to 5pm.

Once this period of counter-representations has closed, the Forward Planning Team will collate the counter-representations and publish these online. They will also be made available for public inspection at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to



5pm. The next anticipated step will be for the Council to contact the Department for Infrastructure to request an Independent Examination of the draft Plan Strategy.

Contact Us

For further assistance, please contact the Forward Planning Team at Mossley Mill, Newtownabbey:

By Post – Forward Planning Team

Mossley Mill

Carnmoney Road North, Newtownabbey

BT36 5QA

By Email – planning@antrimandnewtownabbey.gov.uk

By Telephone – 0300 123 6677



SECTION A – DATA PROTECTION AND CONSENT

Antrim and Newtownabbey Borough Council complies with the General Data Protection Regulation (GDPR) by producing a specific Local Development Plan Privacy Notice, which lets you know how we manage any personal information we receive from you. It contains the standards you can expect when we ask for, or hold, your personal information and an explanation of our information management security policy.

The Local Development Plan Privacy Notice can be found on our website at www.antrimandnewtownabbey.gov.uk/gdpr/planning-gdpr/.

Please note that when you make a representation (or counter-representation) to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the Council's website.

Copies of all representations will be provided to the DfI and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for Independent Examination. A Programme Officer will also have access to this information during the IE stages of the Plan preparation

DfI, the Programme Officer the Independent Examiner will, upon receipt, be responsible for the processing of your data in line with prevailing legislation.

1. 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.

You can contact the Council's Data Protection Officer via:

Post - Antrim Civic Centre, 50 Styles Way, Antrim BT41 2UB

Email - DPO@antrimandnewtownabbey.gov.uk

Phone - 028 9446 3113



SECTION B – YOUR DETAILS

2. 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?

If you are responding as an agent or representing an organisation you will be the main point of contact for your client/organisation.

(Please select only one item)

- ☒ Individual
☐ Organisation
☐ Agent

	Personal Details	Agent Details (If Applicable)
Title	Mr	
First Name	Henry	
Last Name	Boyd	
Job Title (where relevant)		
Organisation (where relevant)		
Client Name (where relevant)		
Address	54 Ballycraigy Road Newtownabbey Co. Antrim	
Post Code	BT36 4SX	
Telephone Number		
Email Address		



SECTION C – REPRESENTATION

Your comments should be set out in full. This will help the Independent Examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

3. To which part of the draft Plan Strategy does your representation relate?

i) Paragraph Number: _____

ii) Policy Heading: **Strategic Policy 4: Homes**

➤ Strategic Policy (SP) Paragraph Number: **SP 4.1 to SP 4.9**

➤ Detailed Management Policy (DM) Paragraph Number: DM17.1 to DM17.8

iii) Page Number in Document: _____

iv) Proposal Map (if relevant state location): **Evidence Paper 2: Settlement Evaluation & Evidence Paper 6: Housing**

4. Do you consider the draft Plan Strategy to be:

☒ 'Sound' (i.e. support)

☐ 'Unsound' (i.e. object)

5. If you consider the draft Plan Strategy to be '**SOUND**' and wish to support the draft Plan Strategy, please set out your comments below.

Mr Boyd broadly supports the draft Plan Strategy and wishes to promote suitable lands within his ownership, for inclusion within the settlement limits which will be defined in the Local Policies Plan (please see attached document).

It is noted that the identified lands at Ballynure and Roughfort are considered to have 'No Obvious Development Constraint' by their respective Strategic Settlement Analyses.



(Continue on a separate sheet if necessary)

6. If you consider the draft Plan Strategy to be '**UN SOUND**' please identify which test(s) of soundness your representation relates to having regard to the



Department for Infrastructure's published Development Plan Practice Note 6 'Soundness' (Version 2).

Soundness Tests:

- ☐ **P1** - Has the DPD¹ been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
- ☐ **P2** - Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- ☐ **P3** - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?
- ☐ **P4** - Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
- ☐ **C1** - Did the Council take account of the Regional Development Strategy.
- ☐ **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?
- ☐ **CE3** - Are there clear mechanisms for implementation and monitoring?
- ☐ **CE4** - Is it reasonably flexible to enable it to deal with changing circumstances?

Details

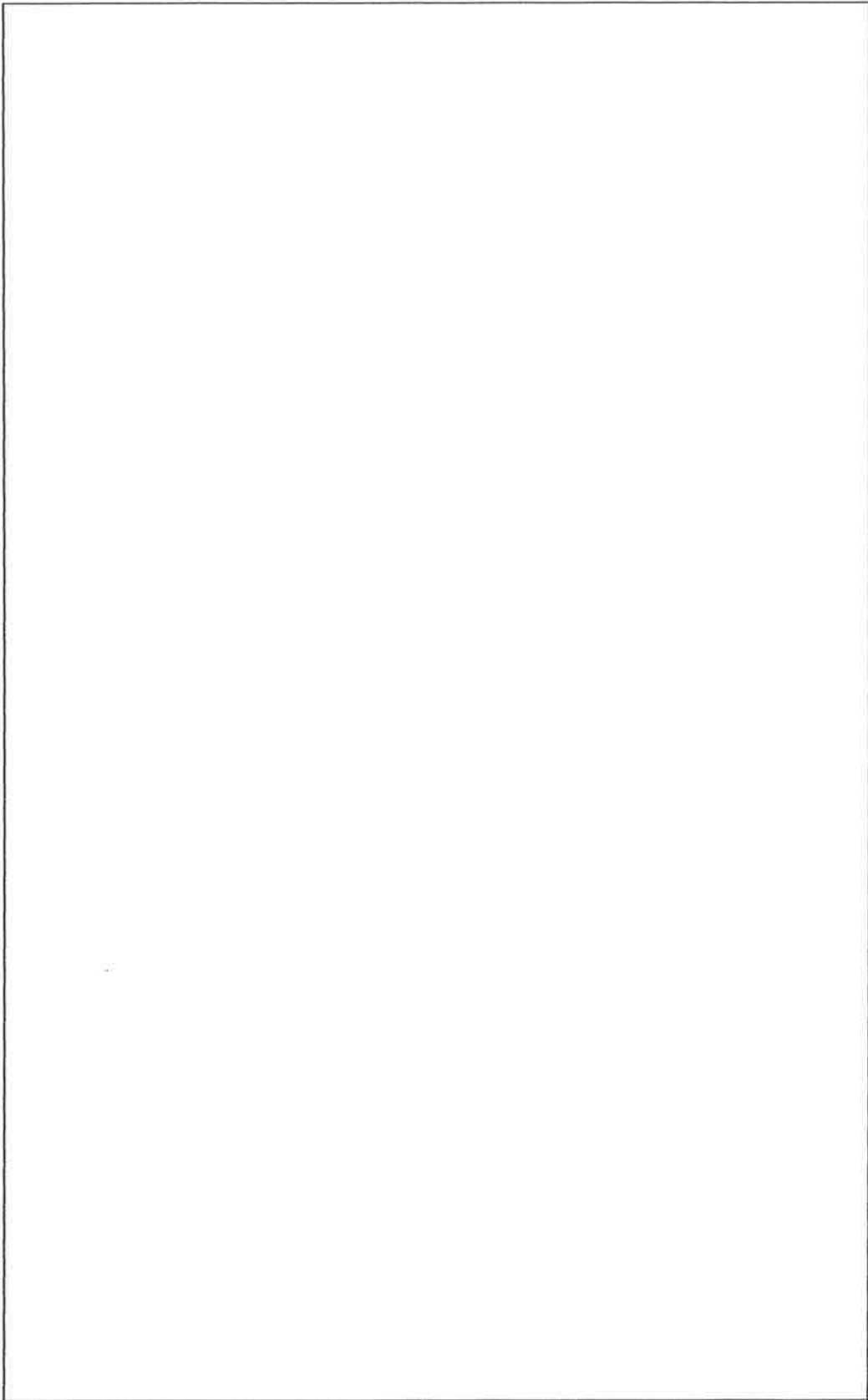
¹ Development Plan Document (DPD) – Comprises of the draft Plan Strategy



7. Please give details of why you consider the draft Plan Strategy to be '**UN SOUND**' having regard to the test(s) you have identified above. Please be as concise as possible.

Please Note: Your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **This representation will be considered during the IE and here will be no further opportunity to submit information unless the Commissioner requests it.**





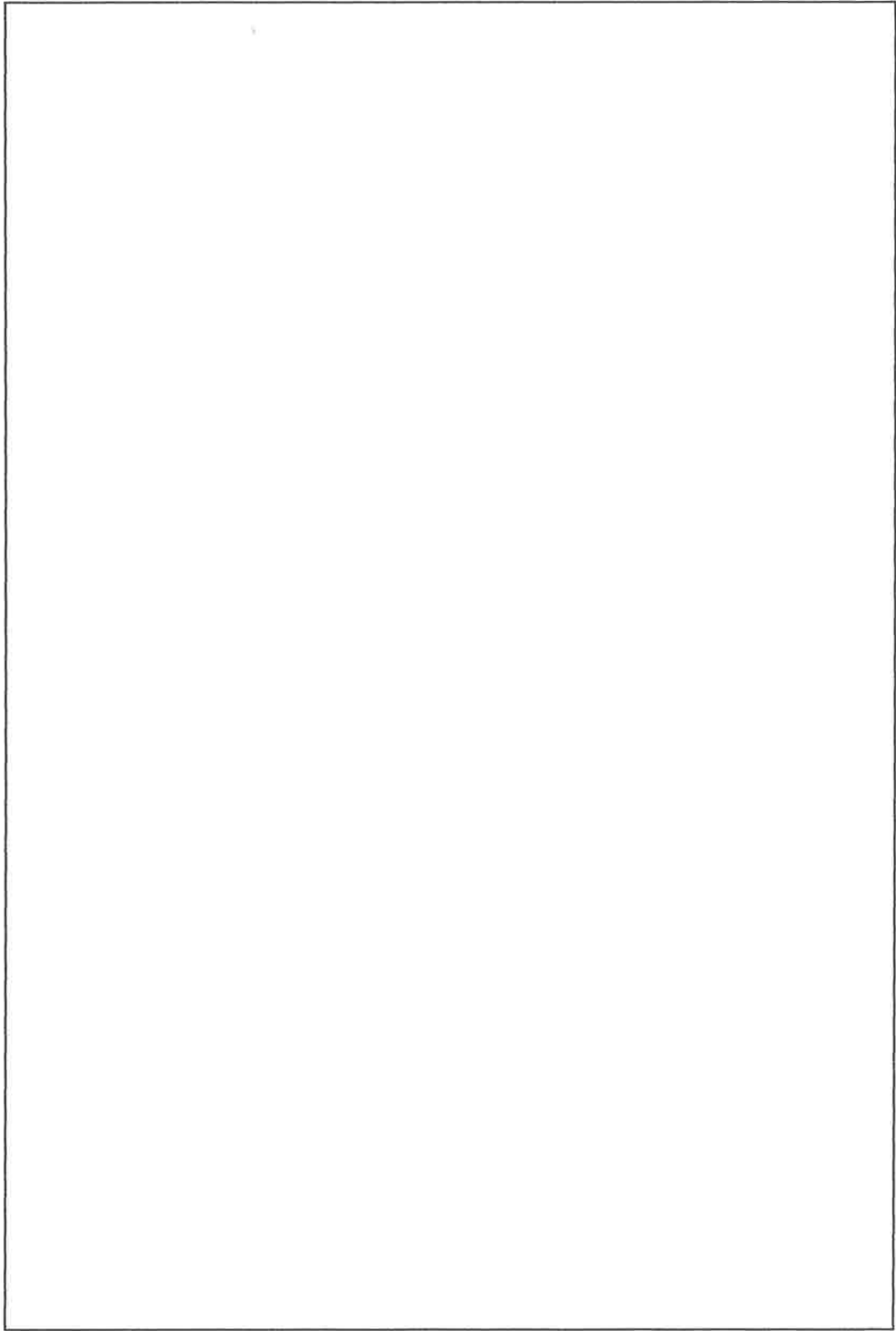
(Continue on a separate sheet if necessary)



Modifications

8. 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.





(Continue on a separate sheet if necessary)



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

Please Note: Unless you specifically request an oral hearing, the Commission will proceed on the basis that you are content to your representations considered in written form only. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orally or not.

Please select only one item;

☒ Written Representation

☐ Oral Hearing

Signature:

Date:

28-8-19

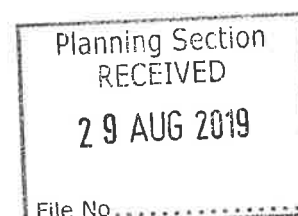
Thank you for your response.



Representation to the Antrim and Newtownabbey
Borough Council Local Development Plan 2030 draft
Plan Strategy



on behalf of Mr Henry Boyd for lands to the west of Larne
Road, Ballynure



1.0 Introduction

- 1.1 This representation has been prepared on behalf of Mr Henry Boyd as owner of lands which may be suitable for future development at the settlement of Ballynure. As identified by the Draft Strategy (DS) and supporting evidence, development opportunities within the existing settlement limit are “extremely limited”.
- 1.2 This information is provided in advance of the Local Policies Plan (LLP) and seeks to ensure that the identified lands may be included within the defined settlement limits of Ballynure. It is considered that these lands are ideally suited to residential development and would make a positive contribution towards achieving an adequate supply of housing land during the Plan period. The subject lands may also be suitable for employment uses as they are easily accessible, with good public transport links and supporting infrastructure such as superfast broadband and 4G mobile coverage.

2.0 The Subject Lands

Site Location, surroundings and access

- 2.1 The subject lands, comprising approximately 6.4Ha, are edged in blue in Figure 1 below. As shown, these lands are located outside the currently defined settlement limits for Ballynure and they border existing development to the north-west and south-west. The eastern boundary is defined by the Larne-Belfast Road and adjacent to the north-eastern corner are a further 4no. existing residential properties (fronting on to the public road). Existing developments around the subject lands include:-
 - Lismenary Road
 - Downey Bungalows
 - Toberdowney Park
 - Toberdowney Valley
- 2.2 The subject lands have no notable planning history and at present they remain in active agricultural use.
- 2.3 The lands are currently accessed via an agricultural gate on the Larne-Belfast Road. An additional access route is also available via Lismenary Road and Toberdowney Park.

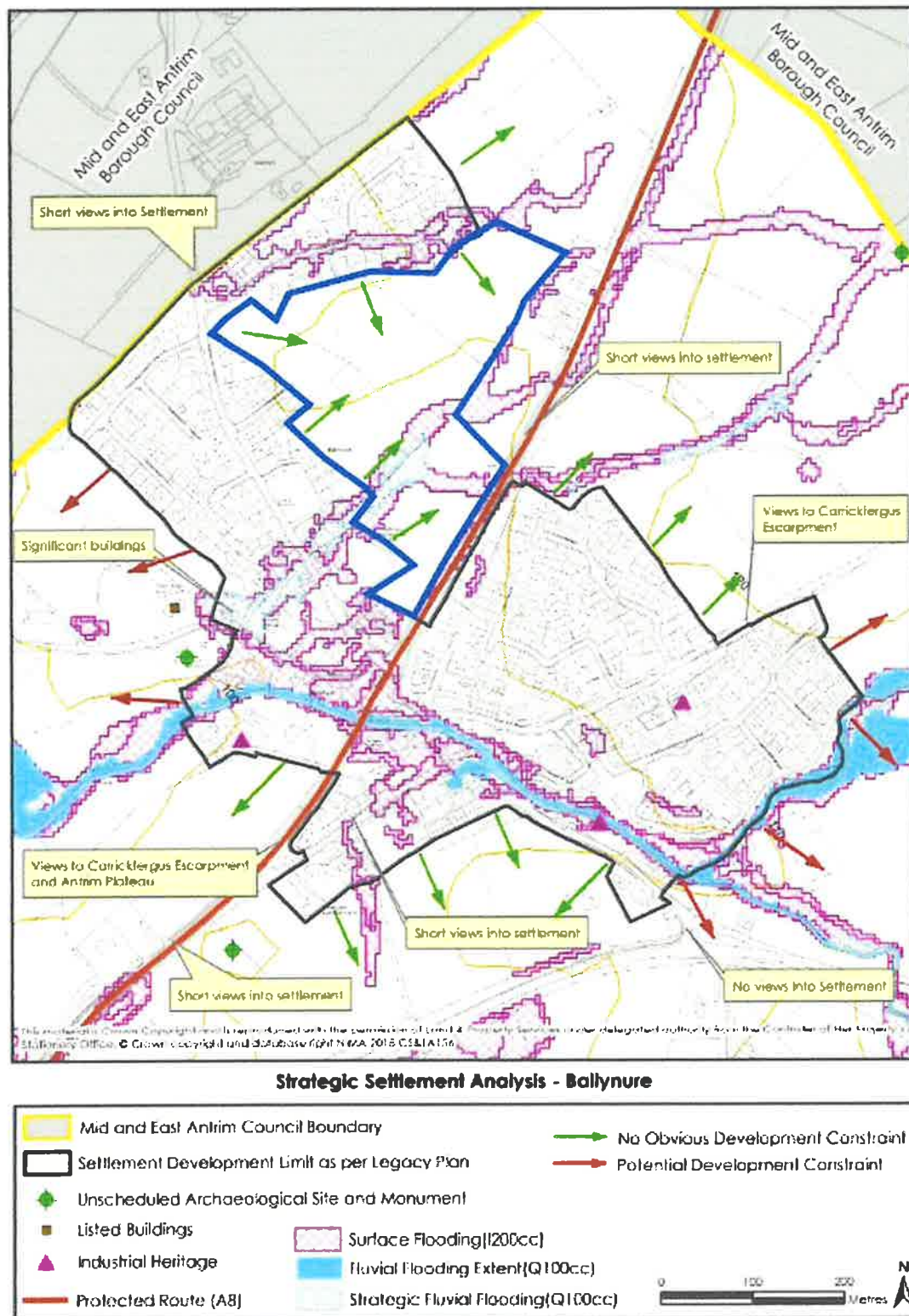


Figure 1 - Annotated extract of Strategic Settlement Analysis for Ballynure

Strategic Location

- 2.4 The subject lands are strategically located within close proximity of the recently completed A8 Belfast-Larne Dualling Scheme. Local access is provided by the old Belfast-Larne road which, as a result of the bypass, now experiences low volumes of traffic. Due to its location, the subject lands benefit from excellent road connections to Belfast, Larne and the M2 motorway. Ballynure is recognised as a commuter settlement due to its strategic location along the Eastern Seaboard Key Transport Corridor. For this reason Ballynure has become an increasingly attractive location to live and the area has experienced a population growth of 8% between 2004-2014, well above the Regional average.
- 2.5 The proposed lands also benefit from a wide range of services and facilities because of this strategic location. These include:-
- Access to the public sewerage network (which has capacity for new connections)
 - Access to public transport services with direct connections to Belfast, Larne and Antrim Area Hospital
 - Good pedestrian access with existing linkages to the centre of Ballynure
 - Access to schools and public parks (both within 400m of the subject lands)
 - Access to local shops and services (both within 400m of the subject lands)

3.0 The Designation of new Settlement Limits

Site Location, surroundings and access

- 3.1 Section 3 of the Draft Plan Strategy outlines the Spatial Planning Framework for the new Plan. This has been prepared in accordance with the Regional Development Strategy 2035 and will ultimately provide a foundation for the Local Policies Plan. Strategic Objective 8 seeks to ensure a sufficient supply of land for new homes, to provide a diverse choice of housing. SP 1.8 and SP 1.9 set out an intention to bring forward settlement limits and specific land use designations which will steer growth and development.
- 3.2 At present there is no published policy or guidance to define what matters should (or should not) be considered when deciding on the position of settlement limits. However, it is widely acknowledged and accepted that in defining settlement limits, the Planning Authority must consider factors such as:-
- Population growth – demand for new housing/employment opportunities/services during the Plan period;
 - The capacity of the existing settlement limit to accommodate new development (including any specific allocations);
 - The capacity of existing facilities, services, utilities and the road network;
 - Committed sites with extant planning permission;

- The physical characteristics of the settlement and its surroundings, including any constraints or sensitive features;
- The presence of existing boundary features which could define the urban/rural edge, i.e. field boundaries, roads, rivers, walls, hedges, woodland etc
- The existing urban footprint and the potential for rounding off to provide a better defined urban edge.

3.3 Whilst this is not an exhaustive list, it is clear that Ballynure has very limited capacity to absorb new development without a significant extension to the existing settlement limits. It is also clear that the subject lands present a realistic opportunity for future development during the Plan period, with a view to accommodating sustainable and managed growth for the population.

4.0 Conclusion

4.1 This representation is submitted in advance of the forthcoming Local Policies Plan and its aim is to promote the identified lands at Ballynure for inclusion within the defined settlement limit

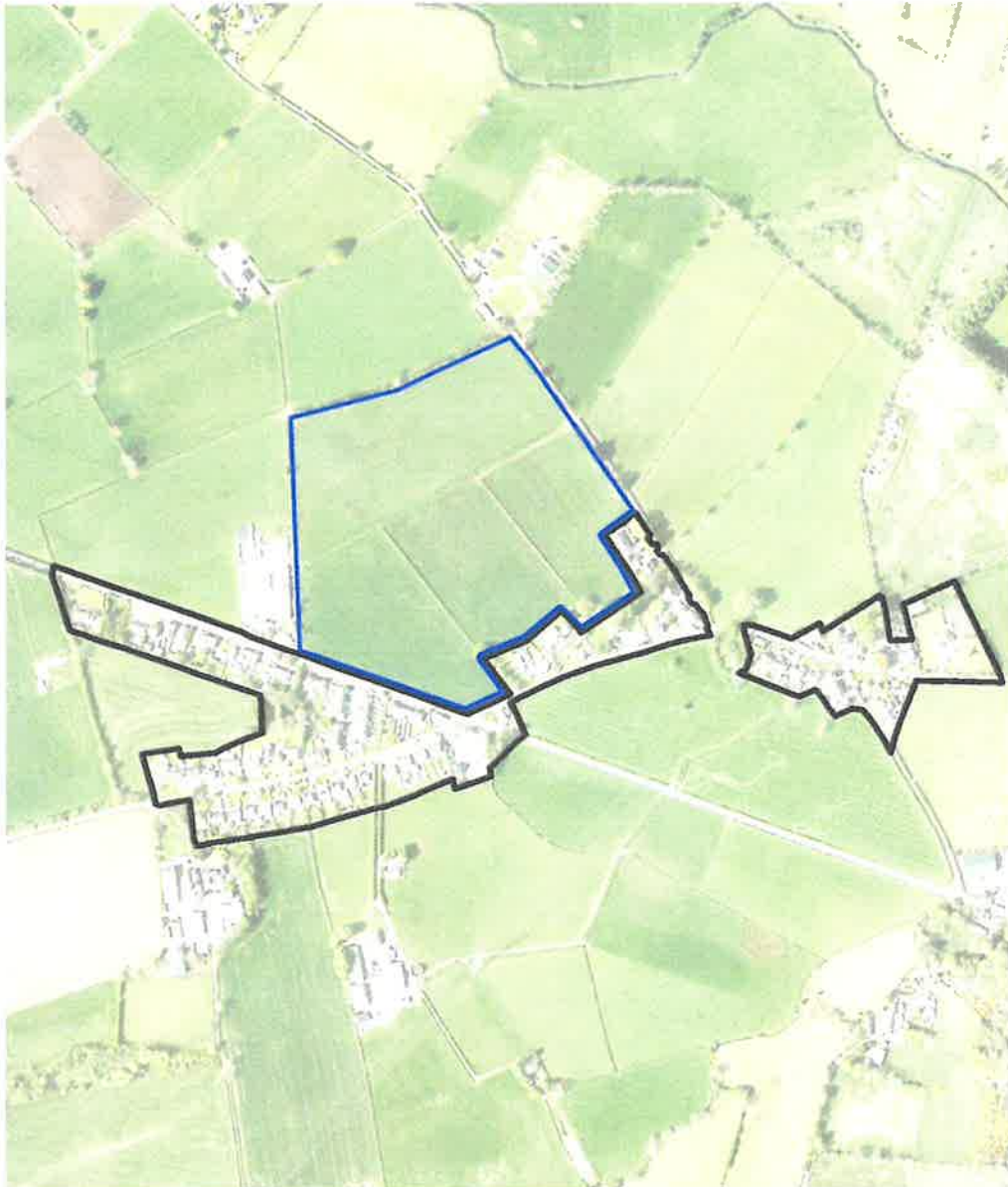
4.2 As outlined above, the subject lands are ideally suited to residential development and are already surrounded by suitable transport links, shops and services. Steady population growth and a need for new housing in this general area has already been acknowledged by the Council.

4.3 Development of the subject lands would result in a 'rounding off' of the existing development footprint at Ballynure. Given the limited opportunities for further development within the existing settlement limits of Ballynure, the subject lands present an obvious and sustainable opportunity for expansion. The need for additional housing at Ballynure has already been identified and it has also been acknowledged that existing settlement limits cannot provide an adequate supply of housing land for the Plan period.

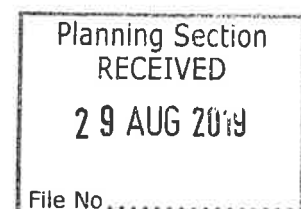
4.4 The development of these lands would not encroach into the open countryside. Importantly, due to the presence of existing road frontage development along the Larne-Belfast Road, development of the subject lands would result in a strong urban/rural edge. At present, there is no clear distinction or the urban area on this side of Ballynure. Most importantly, the Strategic Settlement Analysis which forms the evidence base to the draft Strategy, has not identified any potential constraints to developing these lands. Based on the physical suitability of these lands, and the identified need for additional housing lands within Ballynure, we argue that the subject lands should be included within any proposed settlement limit.

4.5 We trust that the above will be given your full consideration in preparing the Local Policies Plan

Representation to the Antrim and Newtownabbey
Borough Council Local Development Plan 2030 draft
Plan Strategy



on behalf of Mr Henry Boyd for lands to the north of Old
Coach Road, Roughfort



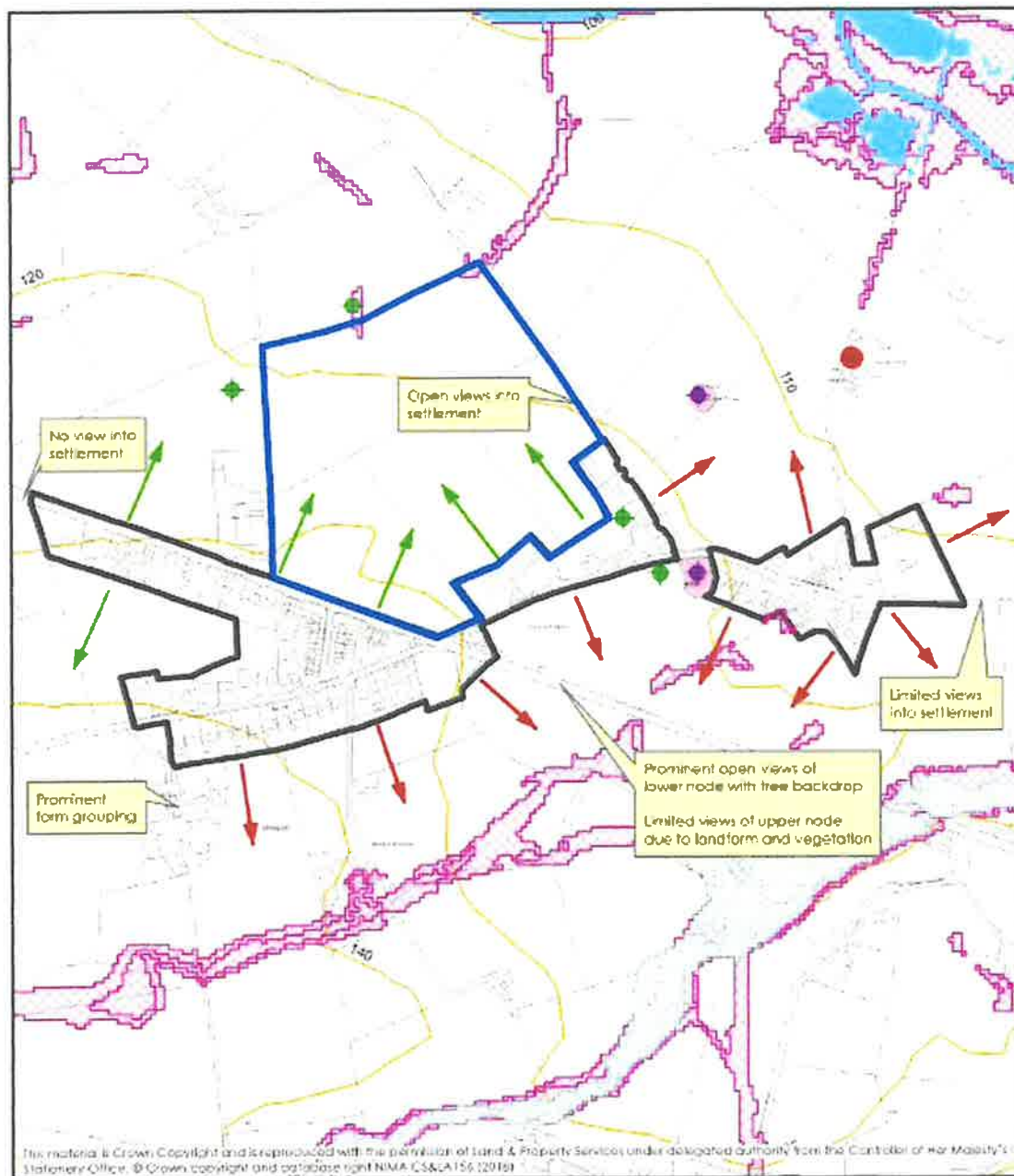
1.0 Introduction

- 1.1 This representation has been prepared on behalf of Mr Henry Boyd as owner of lands which may be suitable for future development at the settlement of Roughfort.
- 1.2 As identified by the Draft Strategy (DS) and supporting evidence, within the existing settlement limit, there are only opportunities for infill development to accommodate growth. These infill opportunity sites are not identified with the Strategic Settlement Analysis (SSA) and a map-based assessment of Roughfort suggests that these infill opportunities are extremely limited. The SSA also identifies a number of potential constraints to the expansion of Roughfort. The assessment indicates that development to the south of Roughfort Road and to the south of Lylehill Road is unlikely to be feasible. The subject lands lie outwith these areas of potential constraint.
- 1.3 This submission is provided in advance of the Local Policies Plan (LLP) and seeks to ensure that the identified lands may be included within the defined settlement limits of Roughfort. It is considered that these lands are ideally suited to residential development and would make a positive contribution towards achieving an adequate supply of housing land during the Plan period. The subject lands may also be suitable for employment uses as they are easily accessible, with good public transport links and supporting infrastructure such as superfast broadband and 4G mobile coverage. Existing employment uses lie immediately to the west of the subject lands, these also outside the current settlement limit.

2.0 The Subject Lands

Site Location, surroundings and access

- 2.1 The subject lands, comprising approximately 10Ha, are edged in blue in Figure 1 below. As shown, these lands are located outside the currently defined settlement limits for Roughfort and they border existing development to the south and west. The eastern boundary is defined by Millbank Road and the northern boundary comprises of a tall hedgerow with mature trees. Existing developments around the subject lands include:-
 - Road frontage dwellings along Roughfort Road
 - Road frontage dwellings along Millbank Road
 - A Translink Bus Terminus
 - Factory and Recording Studio at B95 Old Coach Road/Mallusk Road
- 2.2 The subject lands have no notable planning history and at present they remain in active agricultural use.
- 2.3 The lands are currently accessed via 2no agricultural gates which are located on Old Coach Road/Mallusk Road (adjacent to the Translink bus terminus) and Millbank Road.



Strategic Settlement Analysis - Roughfort

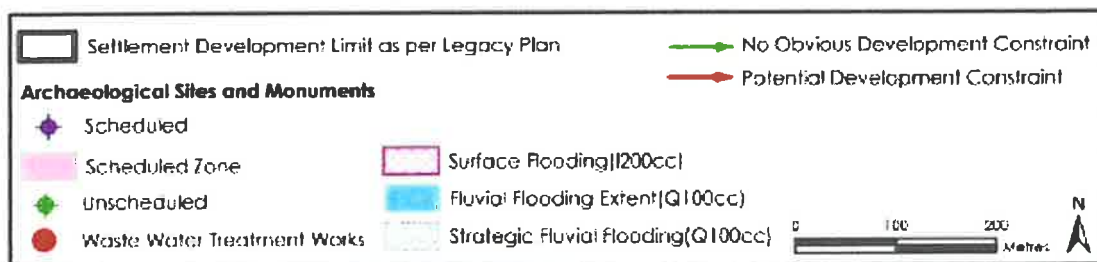


Figure 1 - Annotated extract of Strategic Settlement Analysis for Roughfort

Strategic Location

- 2.4 The subject lands are strategically located within close proximity of Key Transport Corridors. The subject lands lie approximately 7km from the Sandyknowles junction which connect the M2/North West Transport Corridor and the A8/Eastern Seaboard Key Transport Corridor. The subject lands lie approximately 4km from Mallusk, an extensive area of employment within the Borough.
- 2.5 The proposed lands also benefit from a wide range of services and facilities because of this strategic location. These include:-
- Access to the public sewerage network. Roughfort is served by its own Waste Waste Treatment Works (WWTW) which has capacity for new connections;
 - Access to public transport services with direct connections to Mallusk, Glengormley and Belfast City Centre;

3.0 The Designation of new Settlement Limits

Site Location, surroundings and access

- 3.1 Section 3 of the Draft Plan Strategy outlines the Spatial Planning Framework for the new Plan. This has been prepared in accordance with the Regional Development Strategy 2035 and will ultimately provide a foundation for the Local Policies Plan. Strategic Objective 8 seeks to ensure a sufficient supply of land for new homes, to provide a diverse choice of housing. SP 1.8 and SP 1.9 set out an intention to bring forward settlement limits and specific land use designations which will steer growth and development.
- 3.2 At present there is no published policy or guidance to define what matters should (or should not) be considered when deciding on the position of settlement limits. However, it is widely acknowledged and accepted that in defining settlement limits, the Planning Authority must consider factors such as:-
- Population growth – demand for new housing/employment opportunities/services during the Plan period;
 - The capacity of the existing settlement limit to accommodate new development (including any specific allocations);
 - The capacity of existing facilities, services, utilities and the road network;
 - Committed sites with extant planning permission;
 - The physical characteristics of the settlement and its surroundings, including any constraints or sensitive features;
 - The presence of existing boundary features which could define the urban/rural edge, i.e. field boundaries, roads, rivers, walls, hedges, woodland etc
 - The existing urban footprint and the potential for rounding off to provide a better defined urban edge.

- 3.3 Whilst this is not an exhaustive list, it is clear that Roughfort has very limited capacity to accommodate new development within its existing settlement limits. It is also clear that the subject lands present a realistic opportunity for future development during the Plan period, with a view to accommodating sustainable and managed growth for the population. Critically, no obvious constraints have been identified which could impede the development of these lands during the Plan period.

4.0 Conclusion

- 4.1 This representation is submitted in advance of the forthcoming Local Policies Plan and its aim is to promote the identified lands at Roughfort for inclusion within the defined settlement limit
- 4.2 As outlined above, the subject lands are ideally suited to residential development. This area is well served by public transport and lies within close proximity of the extensive employment opportunities at Mallusk. Recent developments and planning approvals at Roughfort indicate a demand for new housing and additional lands will be required to allow this sustainable pattern of growth to continue over the next 10-15 years.
- 4.3 Given the limited opportunities for further development within the existing settlement limits of Roughfort, the subject lands present an obvious and sustainable opportunity for expansion. It has been acknowledged that opportunities exist to 'round off' the settlement limit at Roughfort. By including the subject lands, this rounding off could occur whilst avoiding the identified constraints to the south of the settlement.
- 4.4 Roughfort has an unusual development footprint, exhibiting a linear form which is dissected by both Roughfort Road and B95 Old Coach Road/Mallusk Road. As a result, the settlement is split into two separate clusters and there is a weakly defined edge with the open countryside. As most of the existing built development within Roughfort is located on the southern side of Old Coach Road the settlement appears elongated and imbalanced.
- 4.5 When assessed from the B95, the subject lands appear as a gap between these two clusters of development. It does not represent an important gap and it does little to enhance the legibility of the hamlet. We suggest that by developing these lands and infilling the gap, this would achieve a more compact urban footprint, creating a more distinctive sense of place and an identifiable settlement in its own right.
- 4.6 For the above reason, we submit that the proposed lands should be included within the future settlement limit for Roughfort. We trust that the above will be given your full consideration in preparing the Local Policies Plan