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23<sup>rd</sup> August 2021

Denise Dickson  
Planning Department  
Causeway Coast and Glens Borough Council  
Cloonavin  
66 Portstewart Road  
Coleraine  
BT52 1EY

Dear Madam,

RE: PLANNING APPLICATION LA01/2019/0337/F FOR RETENTION LOCKBOX STORAGE FACILITY (40 NO. STORAGE CONTAINERS) AND EXISTING VEHICULAR ACCESS POINT, PROVISION OF EARTH BUNDING WITH LANDSCAPED PLANTING BUFFER ON SOUTH EASTERN BOUNDARY AND LANDSCAPED PLANTING ON SOUTH WESTERN BOUNDARY OF ESTABLISHED COMMERCIAL SITE. (SITE FORMALLY USED FOR HARD STAND FOR SALE AND HIRE OF LEISURE AND HEAD OFFICE FOR GUARDFORCE SECURITY LTD) AT LANDS AT 30 GLENLOUGH ROAD, AND LANDS TO THE REAR OF 28 GLENLOUGH ROAD, BALLYMONEY.

I refer to the above planning application, and the Planning Committee (PC) Report for this item on the Council's August 2021 meeting.

This letter addresses each of the refusal reasons listed in the PC Report. I would be grateful if this letter can be considered a late item and circulated to all Councillors on the Planning Committee prior to the hearing.

This site has been a commercial site for over 50 years, used both as a headquarters by Guardforce Security Ltd with around one third of the site used for the storage, hire and sales of leisure vehicles. There is extensive planning history on the site which has been given little weight in the PC Report.

I make the following comments regarding the proposed reasons for refusal, namely:-

Principal: Matthew Kennedy [MRTPI] - [REDACTED] Office Manager: Mary Kennedy - [REDACTED]  
Town Planners: Claudine Christy [MRTPI] - [REDACTED] Co. Reg. No.: NI 046486 VAT No.: 77370 1817  
Lee Kennedy - [REDACTED]  
Leeanne Hegarty - [REDACTED]



- **Refusal Reason 1 - Policy CTY 1.**

This is an objection in principle, and if the other refusal reasons cannot be sustained then this refusal reason also falls.

- **Refusal Reason 2-Policy PED 4.**

I attach a copy of an aerial photo at **Appendix MKA 1**, taken in 1998 of the site showing a number of storage buildings and large concrete hardstanding on the front part of the site, used by Guardforce Security Ltd for storage, distribution and office uses.

The aerial photo highlights that the planning permission **D/93/0242** for the sale and hire of leisure vehicles had been implemented.

Sam Barr was the owner of Causeway Coast Camping Cars and confirmed in a letter (**Appendix MKA 2**) that in addition to the sale of camper vans, these vans were also stored on this site for customers in the winter months. This site, clearly has an established history of storage and distribution uses, falling under use class B4 Storage and Distribution under the Planning (Use Classes) Order (NI) 2015.

The aerial photo also shows that the majority of the site was used for the storage of vehicles associated with the security business. Due to the security situation in Northern Ireland, staff parked here and were mini-bussed to their workplaces and back to head office to collect their vehicles. As outlined in Sam Barr's (former managing director of Guardforce Security Ltd) letter at **Appendix MKA 2**, this site employed up to 62 members of staff. The number of people attending the site for the subject proposal is being significantly reduced. This is a planning gain and something which has not been considered in the PC Report.

- **Refusal Reason 3-Policy PED 4.**

The only increase in the original site area of the application site is to provide the earth bund and extensive landscaping to screen the proposed site. The proposed screening provides significant environmental benefits, deals with the integration of the whole site and the overall visual impact is less than that previously on the site.

- **Refusal Reason 4 -CTY 1, CTY 13 and CTY 14.**

The site is located nearly 80 metres off the Frosses Road. It is a longstanding commercial site in the countryside which is in character with the surrounding area. The existing and proposed vegetation ensures that the proposal visually integrates into the landscape. Furthermore, the painting of the containers will further ensure suitable integration into the landscape. In terms of rural character, the site has been commercial site for over 50 years and will not change the character of the area.

- Refusal Reason 5-Policy PED 9.

In terms of residential privacy and amenity, Mr Barr lives in the adjoining dwelling, has operated a security business at this location for over 50 years and is fully in support of this proposal.

Environmental Health have no objection to the proposal subject to conditions.

Lockbox operates in Ballymena, Ballycastle and Coleraine and have never had any complaints in regard to residential amenity.

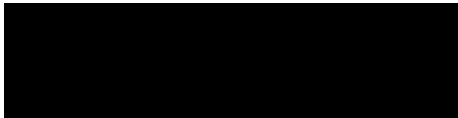
I do not believe that a storage container, open 0.6m higher than the 2m privacy fence will result in any "hemming in" effect on the adjoining property. This layout also protects these residents' privacy and amenity.

- Refusal Reason 6-Policy PED 9 and AMP 2.

All outstanding roads issues can be dealt with by way of a negative condition, which the Applicant is happy to accept, requiring provision of requested drawings within 4 weeks of any permission.

I trust this is satisfactory, but if you have further queries please do not hesitate to contact the undersigned.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Matt Kennedy MRTPI

Principal

MKA Planning Ltd.

c.c. Client – Michael Blaney.

# Appendix MKA 1

MKA PLANNING LTD  
Chartered Town Planners

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Tel: (028) 71 311551 Fax: (028) 71 313404



# Appendix MKA 2

MKA PLANNING LTD  
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To whom it may concern,

I Mr Sam Barr in my role as owner of Causeway Coast Camping Cars can confirm that we operated a camper van sales, hire and storage facility from our premises located at 28-30 Glenlough Road, Ballymoney. During the period 1993 to 2012 the company used the site as a sales office and storage yard for the sale, hire and storage of customer camper vans. The business actively sold and offered camper vans for hire as well as storing camper vans for customers during the winter.

Yours Faithfully

A solid black rectangular box used to redact the signature of Mr Sam Barr.

Mr Sam Barr

Causeway Coast And Glens

Dated: 01 Feb 2021

**Supporting Statement - To whom it may concern:**

I hereby testify as Mr Sam Barr, Former Managing Director of Guardforce Security Limited that we operated Guardforce Security's UK Head Quarters from our premises located at 28-30 Glenlough Road, Ballymoney during the period 1993 to 2016.

Guardforce 24hr UK Head Quarters operated solely from our Glenlough Road site as outlined on the attached map and employed 62 members of staff across the UK and Ireland.

This site was our UK Head Quarters with office, communication command center and a secure large storage yard which was used to store lighting towers, security fencing, camera towers and various other heavy plant and equipment required for our security contracts. The site was used to store our fleet of company minibuses, vans, cars and trailers used by our 62 staff.

The site was used as a gathering point for employees where they could safely store their cars while being transported by company minibus to carry out shifts at high security government installations during the troubles.

I can confirm that during Guardforces' 23 years of operation from 28-30 Glenlough Road we operated 2 x 12hour shifts over a 24hour period and due to the high security nature of our contracts involving various government agencies and the NIO, the property was manned and active 24Hrs a day 365 days a year.

Yours Faithfully

A solid black rectangular box used to redact the signature of Sam Barr.

Sam Barr