

**Response ID ANON-3WQE-DUPH-H**Submitted to **Local Development Plan 2030 - Draft Plan Strategy Representations**Submitted on **2019-09-20 16:54:01****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:**

I am an Agent

**Please specify your contact details:****Title:**

Mrs

**First name:**

Grainne

**Last name:**

Rice

**Job Title (where relevant):****Organisation Name (where relevant):**

Donaldson Planning

**Agent Name (if applicable):****Client Name (if applicable):**

John Mulholland Motors

**Address:**

50a High Street

Holywood

**Postcode (please enter your full postcode):**

BT18 9AE

**Telephone number:**

02890423320

**What is your email address?****Email:**

grainne@donaldsonplanning.com

**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:**

**Policy Heading:**

**Strategic Policy (SP) Paragraph Number:**

SP 1.6

**Detailed Management Policy (DM) Paragraph Number:**

DM 1, DM 1.3 + DM 7

**Page Number In Document:**

65 , 89 + 99-101

**Proposal Map (If relevant state location):**

Strategic Settlement Analysis - Randalstown

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

C1 - Did the Council take account of the Regional Development Strategy., 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:**

DPS fails to make sufficient provision for employers of regional significance in local towns. Specifically, John Mulholland Motors in Randalstown is a long standing major employer within the Council area which is severely constrained within the context of its edge of settlement location.

The Settlement Evaluation (Evidence Paper 2) makes no reference to the evident constraints at this important entrance to the town where the car sales operations frequently exceed the physical site boundaries into the surrounding area. Instead page 58 of EP 2 simply acknowledges that land for employment uses is limited.

Page 57 of EP 2 refers to the site as a 'small industrial unit comprising car sales' and that 'the majority of the economically active travel further afield for employment opportunities'. In this case there is a clear opportunity for Council to support the growth of an established local business and promote further employment opportunities within the Borough.

The Strategic Settlement Analysis graphic on page 60 clearly focuses on the potential for expansion to the north and west of the town and not to the south-east where there is an evident and acute need for growth. The potential allocation of additional employment land which would be accessed through the town to the north and west would not be suitable for John Mulholland Motors due to the nature of its transportation needs. Employment growth at this key node close to the M22 is critical for the retention of major employers such as John Mulholland Motors who continue to grow at a significant rate.

SP 1.6 (c) is unduly restrictive for Randalstown in the use of terminology such as 'consolidation' rather than the 'strengthen' and 'growth' emphasis for the larger towns. This indicates that Randalstown will not be afforded an opportunity to accommodate firm economic development opportunities such as this.

In this case it is considered that the soundness test has not been met in relation to Randalstown by virtue of policy objective RG 1 of the RDS which seeks to 'ensure adequate supply of land to facilitate sustainable economic growth' .

John Mulholland Motors reserves the right to make further submissions at the Local Policies stage.

**Upload File:**

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**Modifications**

**If you consider the draft Plan Strategy to be 'UN SOUND', 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:**

SP 1.6 (c) revised to support, strengthen and grow in view of the economic opportunities offered by major employers in the town such as John Mulholland Motors

**File Upload:**

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**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