Local Development Plan 2032 Technical Supplement Paper 2B

Urban Capacity Study



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1.0 INTRODUCTION

Purpose of this document

- 1.1 This technical supplement is one of a suite of topic-based documents detailing the evidence base used to inform the preparation of the Ards and North Down Local Development Plan 2032 (LDP), draft Plan Strategy. This suite of documents should be read alongside the policies contained within the draft Plan Strategy in order to understand the rationale and justification for the strategic policies and allocations.
- 1.2 In May 2019, the Council launched the Preferred Options Paper (POP), the first of 3 public consultation documents to be issued through the LDP process. The POP outlined the vision and strategic objectives of the plan based upon the baseline information detailed in a suite of position papers. The technical supplements which complement the draft Plan Strategy, will build upon the baseline information gathered in the position papers and show how this has been progressed through the LDP process to formulate the draft Plan Strategy.
- 1.3 The Plan Strategy (PS) will set out the Spatial Growth Strategy for the Borough. This will broadly identify the amount of growth and where it should be directed in terms of housing, commercial development and employment over the plan period.
- 1.4 The Urban Capacity Study (UCS) has been undertaken by the Local Development Plan Team as evidence for the preparation of the new LDP draft Plan Strategy. The findings will inform the LDP housing growth strategy and will also be important in determining the allocation of housing land through the Local Policies Plan (LPP). It should be noted that the findings of this study are an interim position and further work will be carried out prior to the next stage of the plan process and the publication of the LPP. Identification of sites within this report is based upon the best information available at the time of the UCS and identification of sites within this report is not a conclusion on their future allocation for development, nor does it serve to provide a determination that planning permission for development will be granted. Amendments may be required as new information becomes available, or as a result of any changes in policy or guidance.

2.0 REGIONAL POLICY CONTEXT

Programme for Government 2024-2027

2.1 The Northern Ireland Programme for Government (PfG) was published by The Executive Office on 9 September 2024 and agreed in February 2025. The purpose of the PfG is to improve the wellbeing of all citizens in Northern Ireland by tackling disadvantage and driving economic growth. The PfG sets out the Executive's priorities for making a difference to people's lives – comprising nine immediate priorities and three long-term missions of people, planet and prosperity, with a crosscutting commitment to peace. Particularly relevant to housing is an immediate priority to 'providing more social, affordable, and sustainable housing'.

Programme for Government 2016-2021

- 2.2 The Programme for Government Framework 2016-2021 sets out the ambition the Northern Ireland Executive has for our society. These ambitions are generational in nature seeking to achieve 14 key outcomes many of which are relevant to the delivery of health, wellbeing, and community facilities.
- 2.3 The Executive has recently consulted on a new Programme for Government that aims to bring a new focus to deliver lasting, real and positive change in people's lives. The new draft Framework contains nine strategic Outcomes which, taken together, will set a clear direction of travel for the NI Executive and provide a vision for the future of all citizens.
- 2.4 The Draft Programme for Government indicates the commitment to the implementation of goal 13 of the UN 2030 sustainable development goals which requires us to take urgent action to tackle climate change and its impacts.

Regional Development Strategy 2035

2.5 The Regional Development Strategy (RDS) provides an overarching strategic planning framework to facilitate and guide the public and private sectors. It is not limited to land use but recognises that policies for physical development have far reaching implications. The RDS addresses economic, social and environmental issues aimed at achieving sustainable development and social cohesion. The Planning Act (NI) 2011 specifically requires the Local Development Plan must take account of the RDS.

- 2.6 The vision of the RDS is for "An outward-looking, dynamic and liveable Region with a strong sense of its place in the wider world; a Region of opportunity where people enjoy living and working in a healthy environment which enhances the quality of their lives and where diversity is a source of strength rather than division."
- 2.7 The RDS seeks to guide the future distribution of development throughout the region with a view to achieving sustainable development. Housing supply is fundamental to this purpose and the RDS sets policy directions for the provision of housing which aim to deliver development in a more sustainable manner. This means providing additional housing in the Hubs (SFG 12), whilst also sustaining rural communities living in smaller settlements (i.e. smaller towns and villages), and the open countryside (SFG 13). In relation to Ards and North Down Borough, the RDS as part of its spatial framework, identifies Newtownards as a main hub. Bangor and Holywood are grouped within the Belfast Metropolitan Urban Area.
- 2.8 Regional Guidance 8 within the RDS aims to ensure an adequate supply of future housing land and to manage housing growth to achieve sustainable patterns of residential development.
- 2.9 The RDS emphasises a sustainable approach to housing growth, setting a regional target of 60% of new housing to be located on appropriate "brownfield" sites within the urban footprints of settlements greater than 5000 population (RG8). It also aims to ensure an adequate and available supply of quality housing to meet the needs of everyone.
- 2.10 The RDS sets out the regional housing needs across Northern Ireland in the form of Housing Growth Indicators (HGIs). The HGIs are an estimate of the new dwelling requirements for each Council area and are a guide for the preparation of the Local Development Plan. The HGI figures were revised by the Department for Infrastructure (DFI) in September 2019. The latest HGIs use 2016 based household projections and have been calculated for the time period 2016-2030 to align with the timeframe for the majority of Local Development Plans. The 2019 HGI for Ards and North Down Borough is estimated at 5500 dwellings or 367 dwelling per annum. The previous extrapolated figure for the plan period 2015-2030 was 8190 dwellings, based on the 2016 HGI, or 546 dwellings per annum, therefore the revised HGI represents a reduction of 33%.

Strategic Planning Policy Statement

- 2.11 The Strategic Planning Policy Statement (SPPS) was published by the Department of the Environment (DOE) in September 2015. The Strategic Planning Policy Statement (SPPS) underpins the regional guidelines set out in the RDS by promoting an available supply of quality housing to meet the needs of all and by promoting more sustainable housing development. This includes encouraging more housing within existing urban areas, promoting good design and achieving balanced communities. The SPPS states that the LDP process is the primary means for assessing future housing requirements and ensuring the above objectives are met.
- 2.12 The SPPS advises that housing allocations in LDPs should be informed by:
 - RDS Housing Growth Indicators.
 - The RDS Housing Evaluation Framework which takes account of the varying capacities of settlements and assists councils in making judgements on the allocation of housing growth.
 - Allowance for existing housing commitments dwellings built from the base date of the LDP, approvals not yet commenced and residential development applications likely to be approved.
 - Urban Capacity Studies an assessment of the potential of brownfield sites to provide housing land, the availability of infill sites and the potential reuse of existing urban buildings.
 - Allowance for windfall housing an estimate of the potential housing return from unanticipated sites during the formulation of the development plan but which have become available during the lifetime of the plan.
 - Application of a sequential approach and identification of suitable sites for settlements of over 5000 population
 - Housing Needs Assessment/Housing Market Analysis (HNA/HMA) carried out by NIHE, these studies provide an evidence base to guide the amount of land required to facilitate the right mix of housing tenures; including open market and special housing needs such as affordable housing, social housing, supported housing and travellers' accommodation.
 - Transport Assessments these may be required for certain sites for residential use to achieve integration with public transport and other alternatives to the car.

2.13 This Technical Supplement concentrates on the Urban Capacity and Windfall Allowance components. These eight areas are examined in greater detail in the Housing Technical Supplement 2.

Planning Policy Statement 12: Housing in Settlements

- 2.14 The objectives of Planning Policy Statement 12: Housing in Settlements (PPS 12) are to direct and manage future housing growth to achieve more sustainable patterns of residential development. PPS 12 also promotes a drive towards greater housing provision within existing urban areas. It sets out the key guidance in relation to the role of development plans in achieving these objectives and urban capacity studies are highlighted as a vital part of this process.
- 2.15 PPS 12 states that over the course of the Plan period, windfall housing also makes an important contribution towards the supply of housing. Windfall development is housing provision on sites that were neither zoned nor anticipated during the formulation of the development plan, but which have become available during the lifetime of the plan. Windfall development cannot be precisely anticipated and may arise as a result of, for example, plot sub-division or property conversion, residential redevelopment of redundant industrial or commercial buildings, and the erection of dwellings within the gardens and grounds of an existing residential or commercial property.
- 2.16 In compliance with the objectives of the RDS, when determining the number of sites to identify for development in the plan, it is necessary to make allowance for windfall in order to avoid excessive allocation of housing land.

3.0 LOCAL POLICY CONTEXT

The Big Plan for Ards and North Down 2017-2032

3.1 The Big Plan is the Community Plan providing an overarching framework setting out a shared vision and ambition that Ards and North Down's Strategic Community Planning Partnership has agreed to work towards over the next 15 years. The vision of the plan is that Ards and North Down is a vibrant, connected, healthy, safe and prosperous place to be.

- 3.2 The overarching, cross-cutting ambition of The Big Plan is 'To have empowered, resilient individuals and communities, to reduce inequalities; to promote good relations and sustainability; and to improve the accessibility of all public services.'
- 3.3 The Big Plan contains five outcomes that the Plan hopes will reflect the position of the borough by 2032. Outcome 3 of the 'Big Plan' is that 'All people in Ards and North Down live in communities where they are respected, safe and feel secure'. Outcome 5 of the 'Big Plan' is 'All people in Ards and North Down feel pride as they have access to a well-managed sustainable environment.'
- 3.4 Part 2 of the 'Big Plan' was published in April 2022 as a review following the height of the Covid pandemic. Part 2 recognises that a climate crisis has been declared and that if we do not act urgently, the ability to achieve any of the outcomes of the 'Big Plan' will be severely compromised. Climate action and mitigation actions were added to all community planning workstreams.
- 3.5 The Local Government Act 2014 through an amendment to Section 8 of the Planning Act (Northern Ireland) 2011 introduced a statutory requirement that the preparation of the LDP must take account of the Community Plan. The Big Plan will work in tandem with the LDP providing the spatial framework to achieve the shared vision for the Borough.

Ards and North Down Corporate Plan 2020-2024

3.6 The priorities of the corporate plan are closely aligned to those within the Big Plan, the community plan for Ards and North Down, which sets out a long-term vision for Council, local organisations, and communities to work towards. The delivery of the corporate plan, seeks to achieve better outcomes for all the people of our Borough, towards the longer-term vision outlined in the Big Plan.

The Integrated Strategy for Tourism, Regeneration and Economic Development 2018-2030 (Ards and North Down Borough Council)

3.7 The Integrated Strategy presents a vision for the pursuit of prosperity in the Borough of Ards and North Down. The Strategy talks about placemaking and the importance of quality planning and design. Urban stewardship is highlighted as playing an important role in urban regeneration.

4.0 EXTANT AREA PLANS

- 4.1 It should be noted that the Belfast Metropolitan Area Plan 2015 (BMAP) was adopted in September 2014 but was subsequently quashed as a result of a judgment in the Court of Appeal delivered on 18 May 2017. As a consequence of this, the North Down and Ards Area Plan 1984-1995, the Belfast Urban Area Plan 2001, and Bangor Town Centre Plan 1995 are now the statutory Development Plans for the North Down area with draft BMAP remaining a material consideration.
- 4.2 The Ards and Down Area Plan 2015 covers the remainder of the Borough which was previously Ards Borough Council. These plans remain extant until replaced by the new Local Development Plan for the Borough. These existing plans are an important consideration in the LDP process, as they provide a starting point for the review of our spatial planning options.

5.0 URBAN CAPACITY STUDY METHODOLOGY

- 5.1 Planning Policy Statement 12, Appendix 1 provides a broad methodology for undertaking urban capacity studies as part of the development plan preparation process. PPS 12 was published in July 2005 and the development plan process has evolved significantly since its publication, with the Planning Act 2011 introducing a new two stage approach to development plan making. However, the overarching approach for Urban Capacity Studies as set out within PPS 12, is still broadly applicable and establishes the framework for the methodology applied.
- 5.2 The Urban Capacity Study methodology developed around the following 6 stage process and remained under continual review:
 - Stage 1: Identification of committed residential sites
 - Stage 2: Identification of potential new residential sites
 - Stage 3: Assessment of potential new residential sites
 - Stage 4: Assessment of windfall potential
 - Stage 5: Assessment review
 - Stage 6: Results

Study Area

- In order to identify the settlements to be assessed within the Urban Capacity Study, consideration was given to the RDS regional target of 60% of new housing to be located upon appropriate brownfield sites within the urban footprint of settlements with a population greater than 5000. PPS 12 recommends this would therefore be a logical threshold above which an urban capacity study would be necessary to enable determination of urban housing potential. PPS 12 also accepts that in Northern Ireland settlements of lesser sizes can be of greater relative importance within their own locality. Therefore, the guidance sets, as a reasonable minimum requirement, that urban capacity studies should be undertaken for the highest and second tiers within a district. This allows for a more informed decision of the future distribution of housing land.
 - 5.4 Ards and North Down Borough includes the City of Bangor, large town of Newtownards and the three small towns of Comber, Donaghadee and Holywood within its settlement hierarchy. Portaferry has also been included within the small town tier as weight has been given to its role and function; and it was considered suitable for re-classification as a small town.

Table 1. Settlements for which Urban Capacity Studies were undertaken.

	Settlement	Population (2011 Census ¹)
City	Bangor	61,401
Large Town	Newtownards	28,039
Small Towns	Comber	9,078
	Donaghadee	6,869
	Holywood	11,332
	Portaferry*	2,514

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¹ Best figures available at time of the study

- In order to be as robust as possible, the urban capacity study for the Council area not only focused on the city and towns with a population over or nearing 5,000, but assessment also extended to all villages within the Borough. However, due to guidance provided in PPS 12, the results for the villages are not included within the report below, but are set out in the appendices for information purposes.
- 5.6 The RDS seeks to manage housing growth in order to realise more sustainable patterns of residential development. This can be achieved by focusing on the provision of high-quality accessible housing within existing urban areas which does not cause unacceptable harm to the local character and environmental quality or residential amenity of these areas. Opportunities exist for new housing on appropriate vacant land and under-utilised land within the urban footprint of these settlements.
- 5.7 The urban footprint is the continuous built-up area of the settlement. Both the RDS and PPS12 define the urban footprint as, 'an uninterrupted line, often lying inside the planned settlement limit'. The urban footprint excludes undeveloped land on the edge of the settlement. As the plan period commenced at 2017, this has been used as the base date for defining the urban footprint of the settlements in Table 1 above.

Character Assessment Approach

- 5.8 PPS 12 recommends applying a Character Assessment Approach when undertaking an urban capacity study. The entire study area was classified into distinct character areas across four broad character types, involving a comprehensive analysis which is largely dependent on survey:
- 5.9 The four character area types are:
 - Type 1: Distinct areas of vacant/underutilised land sites as a general rule should be of 0.1 hectares minimum size or with a potential of 10 dwellings minimum or less if local circumstances permit.
 - Type 2: Areas already with a landuse commitment:
 - (a) Non-residential: including important public open spaces, established industrial areas, educational and healthcare premises.

- (b) Yet to be established Residential: Comprising development currently under construction or with current planning approval.
- Type 3: Established residential areas, possibly with minor non-residential uses, having a broadly similar character.
- Type 4: Areas with a relatively higher propensity for change including town centres, mixed use areas and transitional areas.

Stage 1: Identification of Committed Residential Sites

5.10 Committed housing sites within urban footprints, have been identified using the Ards and North Down Borough Council's Housing Land Availability Study. Committed sites include zoned and unzoned housing sites that have been commenced, or where no development has taken place but planning permission was extant at 31 March 2021. These are equivalent to Type 2b sites in the PPS 12 Character Assessment Approach and will be identified in the plan as being zoned for residential. The Ards and North Down Borough Council - Housing Monitor (arcgis.com) map viewer includes details of existing commitments within the urban footprint of the settlements for which an Urban Capacity Study was completed.

Stage 2: Identification of Potential New Residential Sites

- 5.11 The first step in identifying potential new residential sites, respecting the PPS 12 Character Assessment Approach, involved a desktop survey commenced during the Winter 2021/2022. Potential sites within both Type 1 and Type 4 character areas were identified.
- 5.12 Type 1 character areas are identified within PPS 12 as 'distinct areas of vacant/under-utilised land'. PPS 12 includes the following key criteria for the determination of potential urban capacity sites:
 - a vacant or occupied site, or part thereof, that is evidently not used or significantly underused;
 - a site conspicuously inappropriate (not just different to) amongst nearby uses;
 and
 - a combination of separate, possibly under-utilised, areas which together comprise an area of potential.

- 5.13 Type 4 character areas are identified within PPS 12 as being 'Areas with a relatively higher propensity for change'. These include town centres, mixed use areas and transitional areas. Within Ards and North Down Borough, these Type 4 areas are predominantly town and city centres.
- 5.14 PPS12 indicates that, as a general rule, sites should be a minimum size of 0.1 hectares or have a potential of 10 dwellings minimum or less, dependent on the local circumstances. The initial desktop survey undertaken applied the 0.1 hectare threshold to all sites identified, however a minimum potential yield of five dwellings was employed where the character of the area dictated. Those identified sites delivering a yield of less than five units, were treated as future potential windfall housing. Future windfall provision is considered further within Stage 4.

Stage 3: Assessment of Potential New Residential Sites

- 5.15 The potential Urban Capacity sites were initially assessed against known assets and constraints using the Council's GIS data. Table 2 provides an overview of the criteria used for the provisional assessment of Type 1 and Type 4 Urban Capacity sites.
- 5.16 Subsequently, Type 1 and Type 4 sites were assigned as follows:
 - 1. Acceptable for Residential Development;
 - 2. Potentially Acceptable for Residential Development;
 - 3. Acceptable for Mixed Use Development (including residential);
 - 4. Potentially Acceptable for Mixed Use Development (including residential); and
 - 5. Not Acceptable for Residential or Mixed-Use Development (including residential)

Table 2. Assessment Criteria

Site Location, Status & Planning History	Infrastructure Constraints	Access Constraints	Environmental Constraints	Natural Designations	Built Heritage Designations	Flooding and Drainage	Contamination	Compatibility
	-WwTW	-Access	-Woodland -Vegetation	-RAMSAR -SPA	-CAs	-Fluvial		-Adjacent Land uses &
	Rivers	Network -Protected Route -Land- locked -Land reserved for a road	-Proximity to Blue Green Infrastructure -Existing Open Space -Topography	-SAC -SLNCI -LNR -TPO -AHSV -AONB -Coastal Area	-ATCs -Mons -Historic Park & Garden	-Coastal		designations

- 5.17 It is acknowledged that certain constraints can result in a site being found unsuitable for development. A site was generally considered acceptable, or potentially acceptable, where there were no insurmountable constraints to development. However, depending on the extent and nature of the constraint, mitigation to overcome these issues may be possible. Where a constraint encompasses part of a site, this may result in a reduction in the size of the developable site and subsequent site yield. The nature of the constraint determined whether a site was assessed as 'Acceptable' or 'Potentially Acceptable'. Important factors in the consideration of sites for mixed use development included location and adjacent land uses.
- 5.18 Further evaluation, in the form of site observation, followed and the assessments were concluded with an overall determination on the suitability to support housing development. Professional judgement was used in the assessment outlined above.

Assessment of Yield

- 5.19 Calculating the potential yield of a site is an important part of the Urban Capacity Study. PPS 12 highlights that it is possible to go into varying levels of detail in order to assess the potential yield arising from urban capacity sites. At this stage of the plan process a density multiplier approach has been adopted, whereby the area of each site identified has been multiplied by an estimated housing density. The density applied varies between each site and is dependent on numerous factors; including the character of the area and recent planning approvals within the area. Established residential areas dominated by medium to low density housing; Conservation Areas and Areas of Townscape Character are likely to have a lower estimated housing density. Sites within town centres, along key and link transport corridors, or within close proximity to main public transportation hubs; are likely have a higher estimated housing density. The use of densities from recent planning approvals provides robust, contemporary and reliable evidence.
- 5.20 It is acknowledged this approach is not flawless and a design led approach to the assessment of site yield is preferable. Whilst a design led approach is likely to be more accurate, it is not considered to be appropriate at this stage as this approach requires detailed individual site assessments informed by numerous factors; including consultees and landowner input. The use of comparable densities from recent and nearby planning approvals, is a step towards this design led approach as it avoids the application of a general density over large areas.
- 5.21 As previously stated, constraints may restrict the net developable area of a site, therefore the potential yield is based on the gross developable area of the site. Where a site has been identified as potentially acceptable for mixed use development, the potential yield is based on the residential development of the entire site.

Stage 4: Assessment of Windfall Potential

5.22 In addition to the identified Type 1 and Type 4 sites, another source of housing provision is through windfall potential. The SPPS considers windfall housing as "central to the assessment of future housing land requirement". Therefore, windfall potential is a key element of the urban capacity study.

- 5.23 The SPPS states a 'full allowance' should be made when determining the amount of windfall housing in the plan in order to prevent the excessive allocation of housing land.
- 5.24 PPS 12 highlights that the allowance for windfall should be confined to land within the urban footprint and greenfield sites should be excluded. Windfall housing results from development on previously developed sites, which unexpectedly become available for housing. This is development which has not been specifically planned for through land use zoning or commitments at any given time. PPS 12 advises that windfall should be assessed by taking into account the additional provision that could potentially arise within the character areas.
- 5.25 PPS 12 outlines the various sources of future windfall based on the character areas highlighted above and these are likely to comprise:
 - sites initially identified within Stage 2 of the urban capacity study which fall below the identified thresholds;
 - provision within Type 3 character areas established residential areas;
 and
 - provision within Type 4 character areas areas with a relatively higher propensity for change – including town centres, mixed use areas, transitional areas.
- 5.26 A number of categories, which may derive potential windfall yield within Type 3 Character Areas, are suggested in PPS 12. These include:
 - sub-division of existing housing;
 - empty homes (where in excess of average vacancy);
 - redevelopment potential;
 - infill;
 - intensification of existing residential (use of private open space);
 - conversion from non-residential;
 - smaller areas of vacant/under-utilised land (below urban capacity site threshold); and
 - other unspecified.
- 5.27 Within Type 4 Character Areas, the categories suggested in PPS 12 include:
 - sub-division of existing housing;

- redevelopment potential (existing housing);
- redevelopment potential (non-residential);
- intensification of existing residential (use of private open space);
- infill:
- conversion from non-residential;
- vacant non-residential;
- car park redevelopment;
- flats over shops;
- opportunity sites (with residential option);
- smaller areas of vacant/under-utilised land (below urban capacity thresholds);
- ancillary space associated with established/committed uses; and
- other unspecified.
- 5.28 The SPPS highlights the importance of considering the approach taken to the Urban Capacity Study. The Urban Capacity Study seeks to identify potential housing development sites which would yield a minimum of 5 residential units. Windfall sites can generally be of any size. Small windfall sites are identified as those sites which would fall below the Urban Capacity threshold of 5 units. The primary aim of the Urban Capacity Study was not to find these small windfall sites, however a number were identified through the analysis. This is a relatively modest number of sites and would not be representative of the total number of small windfall sites likely to come forward over the life of the plan.
- 5.29 Given the intention of the Urban Capacity Study is to identify future residential development sites of over 5 units, it would be natural to expect the quantity of these larger windfall sites to decrease over the life of the plan. However, this is a basic presumption with historic trends in the Borough illustrating this not to be the case. Despite past Area Plans taking a more proactive approach to the zoning of land for residential development, there has been no identifiable reduction in the number of windfall units built following the release of an Area Plan. The years directly following the release of the draft Belfast Metropolitan Area Plan 2015 and the Ards and Down Area Plan 2015 realised an increase in the number of windfall units constructed. The amount of windfall development has been maintained at a generally regular level for a number of years, despite the numerous residential zonings within these area plans.

- Windfall development may be influenced by a number of external factors including changes in regional planning policy approach, changes in demographic trends, global and local economic factors, and the housing market.
- 5.31 There are a range of methodologies for calculating windfall potential; one of these involves examination of past trends for windfall sites coming forward for development and using this as a guide for estimating likely future windfall potential. This methodology is robust and should avoid the under-estimation of future windfall provision. However, due to its unexpected nature, it is difficult to accurately predict future trends in windfall housing development, and it often varies from area to area. As such, regular monitoring of windfall development is essential, and monitoring data will be factored into the LDP review.

Historic Windfall Analysis

5.32 Initially an analysis was undertaken of all residential development planning approvals within the urban footprints of the six nominated settlements and outside housing zonings. This analysis used historic Housing Monitor data over a 17-year period from 2000-2016.



Figure 1. Historic Windfall Development (2000-2016)

200 150 100 50 2004 2012 2013 2014 2015 2016 2003 2005 2006 2007 2008 2009 2010 2011 Donaghadee ■ Newtownards ■ Comber Bangor Holywood Portaferry

- 5.33 Within this timeframe 2670 windfall dwellings were built across the six settlements of Bangor, Newtownards, Comber, Donaghadee, Holywood and Portaferry. Bangor (889) and Newtownards (878) accounted for 1767 windfall units. Comber (326), Donaghadee (248), Holywood (210) and Portaferry (119) accounted for the development of 903 windfall dwellings.
- 5.34 Furthermore, within this timeframe there were 1174 windfall dwellings built across the villages and 216 within small settlements giving a total of 4060.

Table 3. Historic Windfall Development (2000-2016)

	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016		
Large Towns																		Total	Annual Average
Bangor	1	16	37	19	5	80	46	66	80	78	88	28	37	130	71	43		889	
Newtownards	16	13	10	35	16	44	67	49	100	76	68	130	91	48	19	17	79	878	52
Subtotal	17	29	47	54	21	124	113	115	180	154	156	158	128	178	90	60		1767	104
Small Towns																	104 per y	/ear	
Comber	1	5	9	11	30	29	25	16	15	39	18	45	23	14	2	29		326	19
Donaghadee Holywood	- 4 7	12 15	17 4	16 4	8	15 3	5	24 11	8 34	13	11 4	17 19	4	6 9	15 11	41 61	37 3	248 210	
Portaferry	23	14	18	3	1	5	2	1	9	4	5	2	3	1	2	5	21	119	
Subtotal	35	46	48	34	43	52	39	52	66	62	38	83	33	30	30	136	76	903	53
Villages																			
Subtotal	128	139	175	102	114	134	58	86	62	21	17	10	21	22	14	27	44	1174	69
Small Settlem	ents																		
Subtotal	1	9	11	7	7	7	19	36	18	8	36	13	9	7	14	7	7	216	13
Total	181	223	281	197	185	317	229	289	326	245	247	264	191	237	148	230	270	4060	239

- 5.35 The principal settlements, Bangor (52) and Newtownards (52), averaged 104 windfall dwellings per annum over the period analysed. Comber (19), Donaghadee (15), Holywood (12) and Portaferry (7) averaged 53 windfall dwellings per annum over the assessed period. The villages averaged 69 windfall dwellings per annum and small settlements averaged 13 dwellings per annum. Therefore, in total an average of 239 windfall dwellings per annum were constructed within the settlements over the 17-year timeframe.
- 5.36 To estimate how many dwellings will be built outside of housing zonings over the life of the plan, this average of 239 dwellings is multiplied to cover the 10-year time period from 2022 2032 to avoid double counting with total completions between 2017-2022. Therefore, the overall windfall total for the 15-year Plan period is 2390 dwellings.

5.37 However, due to the number of variables which can influence windfall housing development rates, caution should be taken in the use of historic windfall rates to predict future windfall delivery. There are no guarantees future trends will replicate the past and there is a continued drive to further sustainable development and to facilitate sustainable housing growth through the recycling of land and buildings and encouragement of compact urban forms.

Stage 5: Methodology and Assessment Review

- 5.38 The Urban Capacity Study methodology was initially employed for the small town of Holywood. Any issues identified during the assessment of sites within Holywood were refined and the modifications implemented for the remaining settlements. If, throughout the process, any major issues were identified, solutions were adopted and retrospectively applied to those settlements previously assessed.
- 5.39 Consideration of Urban Capacity sites and the density to be applied, varied between settlements and between each character area types within the settlements. Consideration was dependent upon numerous factors; including the character of the area and recent planning approvals within the area. A consistent approach was applied to the assessment of sites, however, due to the number of variables, each site presented its own challenges and was considered on its own individual merit.
- 5.40 Although sites were initially identified using a desk top study, additional potential sites were also identified during the process of site observations. As previously stated, assessment was based upon professional judgment. No sole planning officer was responsible for individual site observations and all assessments were discussed and agreed internally. An audit of 10% of all potential sites was also undertaken. The final yield figures for each settlement were also subject to review.
- 5.41 The results of the Urban Capacity Study will be analysed against the findings of the Council's annual Housing Land Availability Study. This monitoring data will be factored into the LDP review, allowing for any amendments and an extension of the Urban Capacity Study to be undertaken, if required.

Stage 6: Results

- 5.42 The following results tables bring together results from the assessments of each settlement. They detail the estimated housing yield from the identified urban capacity sites.
- 5.43 Separate tables have been produced for the Type 4 Character Areas located within Town Centres. These Urban Capacity sites have the potential to be shown as Development Opportunity Sites within the LPP and may include opportunities for mixed use development.

5.44 Bangor

Table 4. Bangor Urban Capacity Results

Site Reference	Location	Area (Ha)	Estimated Yield
2	77 Rathgael Road, Bangor	0.54Ha	12
3	45-49a Old Bangor Road, Bangor	0.46Ha	17
4	72 Old Bangor Road, Bangor	0.19Ha	5
5	190 Rathgael Road, Bangor	0.45Ha	10
7	Land at 3 and 6 Lyndhurst Crescent, Bangor	0.17Ha	5
8	Rathgael Veterinary Clinic, 24-26 Brook Lane, Bangor.	0.19Ha	16
10	20-32 Green Road, Bangor	0.42Ha	24
11	40 and 46 Green Road, Bangor	0.31Ha	9
13	12 Balloo Road, Bangor	0.17Ha	7
15	1A and 1B Faulkner Road, Bangor	0.37Ha	20
17	9 and 11 Silverstream Road, Bangor	0.14Ha	6
18	165-175 Belfast Road, Bangor	0.50Ha	15
	Cargo Coffee, USA hand car wash and Richard Dorrian car		
	sales. Site opposite Nos. 25-73 Belfast Road and directly		
19	west of No. 16a Belfast Road, Bangor	0.31Ha	29
21	96b, 96c and 96d Abbey Street, Bangor	0.21Ha	7
24	56A Gransha Road, Bangor.	0.12Ha	7
26	229 and 230 Ballycrochan Road, Bangor.	0.38Ha	5
28	Manse at 108 Old Gransha Road, Bangor.	0.35Ha	8
32	79 Bellevue and 135 Donaghadee Road, Bangor.	0.16Ha	6
33	145 Groomsport Road, Bangor.	0.78Ha	8
34	123 Groomsport Road, Bangor.	0.11Ha	5
		Total	221

Table 5. Bangor DOS Results

Site Reference	Location	Area (Ha)	Estimated Yield
DOS BR 1	Flagship Centre, Main Street, Bangor.	1.26	119
	Land to the rear of 15a – 23 Clifton Road and 8 - 30		
DOS BR 4	Stanley Road, and end of Stanley Avenue, Bangor.	0.3	29
	Hamilton House, 43 Hamilton Road, 56a Hamilton Road		
DOS BR 7	and 1a Springfield Avenue, Bangor	0.33	15
	Public car park to the rear of Nos. 41-47 Central Avenue,		
DOS BR 11	Nos. 66-80 Southwell Road and Nos. 48-68 Dufferin	0.1	13
	Land approximately 50m south east of Premier Inn, 7		
DOS BR 12	Castle Park Avenue, Bangor	0.39	15
		Total	191

5.45 Newtownards

Table 6. Newtownards Urban Capacity Results

Site Reference	Location	Area (Ha)	Estimated Yield
	Units 1-5 Lansdowne Industrial Estate, Lansdowne		
1	Road, Newtownards	0.41Ha	10
2	10 Comber Road, Newtownards	0.81Ha	41
3	10-12 Windsor Avenue, Newtownards	0.17Ha	12
6	24 Mountain Road, Newtownards	0.84Ha	8
8	167, 169, 175 and 183 Bangor Road, Newtownards	2.49Ha	75
11	Rear of 44-56 Bangor Road, Newtownards	0.28Ha	22
12	28 Bangor Road, Newtownards	0.1Ha	5
13	36-44 Donaghadee Road, Newtownards	0.32Ha	25
	80 Bowtown Road and land immediately to the east,		
16	Newtownards.	0.93Ha	20
17	1 and 3 Old Movilla Road, Newtownards.	0.49Ha	14
18	20, 22 and 22a Portaferry Road, Newtownards.	0.73Ha	45
19	2E Portaferry Road, Newtownards.	0.11Ha	7
20	Land at Lamont Avenue, Newtownards.	0.52Ha	32
	Former site of Castle Gardens Primary School,		
21	Portaferry Road, Newtownards.	0.71Ha	43
23	51 and 53 Corry Street, Newtownards.	0.13Ha	10
24	Land to the rear of 73-85 William Street, Newtownards.	0.16Ha	13
		Total	382

Table 7. Newtownards DOS Results

Site Reference	Location	Area (Ha)	Estimated Yield
	Harford Inn, West Street and 39 Regent Street,		
DOS NS 3	Newtownards.	0.38	64
DOS NS 5	31-33 West Street, Newtownards.	0.14	16
DOS NS 9	23a East Street and 1 Prices Lane, Newtownards.	0.1	15
DOS NS 16	22 and 24 Court Street, Newtownards.	0.12	9
		Total	104

5.46 Comber

Table 8. Comber Urban Capacity Results

Site Reference	Location	Area (Ha)	Estimated Yield
3	40a Killinchy Road, Comber	0.7ha	8
4	Lands at No. 2a Old Ballygowan Road, Comber	1.11ha	12
7	50 and 52 Castle Lane, Comber	0.21ha	8
9	31-37 Mill Street, Comber	0.32ha	39
		Total	67

Table 9. Comber DOS Results

Site Reference	Location	Area (Ha)	Estimated Yield
DOS CR 1	Land to the rear of Nos. 30-38 Castle Street, Comber	0.1	8
DOS CR 5	2a and land to the rear of 4-8 Bridge Street, Comber	0.17	10
		Total	18

5.47 Donaghadee

Table 10. Donaghadee Urban Capacity Results

Site Reference	Location	Area (Ha)	Estimated Yield
2	Site to the rear of 112 - 120 Warren Road, Donaghadee	0.67ha	9
3	Site to the rear of 100 - 104 Warren Road, Donaghadee	0.51ha	7
	Land within the curtilages of Nos. 47, 47a, 47b and 49		
4	Warren Road, Donaghadee	1.65ha	18
			34

NB. No Development Opportunity Sites were identified within Donaghadee.

5.48 Holywood

Table 11. Holywood Urban Capacity Results

Site Reference	Location	Area (Ha)	Estimated Yield
5	160 High Street, Holywood.	1.5	18
6	Kinnegar Army Barracks, Kinnegar Avenue, Holywood.*	Unknown	Unknown
10	Site at Glenview Farm, 154 Church Road, Holywood	0.7	5
		Total	23

*Proposals for the disposal and redevelopment of Kinnegar Army Barracks are currently under consideration. Redevelopment of the Barracks is likely to involve a variety of uses, including an element of residential use. Therefore, Kinnegar Army Barracks has been identified as an Urban Capacity site however, at this stage it is too early to determine the area of the site that will be given over to residential use. Further consideration of the site and potential yield will be undertaken at the LPP stage.

NB. No Development Opportunity Sites were identified within Holywood.

5.49 Portaferry

Table 12. Portaferry Urban Capacity Results

Site Reference	Location	Area (Ha)	Estimated Yield
3	To the rear of 5b, 5c, 5f and 5g Cloughey Road, Portaferry.	0.5ha	6
	Site to the south of 2 Steel Dickson Avenue, 8-12 Shore Road, including and to the rear of 2-28 Ferry Street and 22-		
5	31 The Square, Portaferry.	0.58ha	63
6	Former PSNI station, 2 Coach Road, Portaferry.	0.18ha	6
		Total	75

NB. No Development Opportunity Sites were identified within Portaferry.

5.50 The sites identified through the Urban Capacity Study have a potential yield of 1,115 units (See Table 13 below).

Table 13. Summary of Urban Capacity Results

Settlement	Urban Capacity Yield	DOS Yield	Total
Towns			
Bangor	221	191	412
Newtownards	382	104	486
Comber	67	18	85
Donaghadee	34	0	34
Holywood	23	0	23
Portaferry	75	0	75
Total	802	313	1115

- 5.51 As the Urban Capacity Study was completed in 2022, those windfall dwellings approved and constructed between 2017-2021 will be accounted for in the Draft Plan Strategy figures for existing housing commitments.
- 5.52 The Historic Windfall Analysis indicated an average of 239 dwellings built per annum, therefore 2,390 windfall dwellings are predicted to be built over the 10-year period 2022-2032.
- 5.53 The Urban Capacity Study total (1,115) is combined with the predicted 2022-2032 windfall total (2,390) to give an overall figure of 3,505 housing units (see Table 14).
- 5.54 The results outlined within this report will form a key part of the evidence base for the LDP Housing Growth Strategy and will provide the foundations for the allocation of housing land in the Local Policies Plan. As acknowledged throughout this document, this is an interim report and further investigation, and refinement of the findings will be undertaken prior to the next stage of the plan process. The identification of any site in this report is not a conclusion on its allocation for development and is certainly not a determination that planning permission for development will be granted. The Urban Capacity Study only provides an insight into the potential housing capacity

within the urban footprint of identified settlements and the main findings of this report are set out in Table 14.

Table 14. Summary of Urban Capacity and Windfall Results

Settlement	Urban Capacity Yield	DOS Yield	Windfall 2022-32	Total
Towns				
Bangor	221	191		412
Newtownards	382	104		486
Comber	67	18		85
Donaghadee	34	0		34
Holywood	23	0		23
Portaferry	75	0		75
Total	802	313	2390	3505

APPENDICES

Appendix A: Extension of Urban Capacity Study to Villages

Appendix B: Urban Capacity Study Character Area Maps

Appendix A: Extension of Urban Capacity Study to Villages

- A.1 To consider the most robust evidence possible, the LDP team extended the Urban Capacity Study to the villages within the Borough. The results for the examination of the villages have not been included in the main report due to the guidance included within PPS 12. The RDS sets a regional target of 60% of new housing to be located upon brownfield sites within the urban footprint of settlements with a population greater than 5000. PPS 12 recommends this would therefore be a logical threshold above which an urban capacity study would be necessary to enable determination of housing potential.
- A.2 The results for examination of the villages are shown for indicative purposes in Table 15 below. Only identified sites with a yield of 5 or more units have been included within the results for the villages.

Table 15: Summary of Results for Villages

Settlement	Urban Capacity Yield		
Balloo	14		
Ballygowan	0		
Ballyhalbert	24		
Ballywalter	8		
Carrowdore	46		
Cloughey ²	0		
Crawfordsburn	0		
Greyabbey	8		
Groomsport	0		
Helen's Bay	0		
Killinchy	0		
Kircubbin	23		
Lisbane	0		
Millisle	30		
Portavogie	44		
Seahill	10		
Total	207		

² potential for 27 units was identified within Cloughey. However, Cloughey is currently served by a retention tank which is at capacity and no upgrade to NI Water infrastructure serving the village is currently planned.

Appendix B: Urban Capacity Study Character Area Maps for the Towns











