

Local Development Plan 2032
Technical Supplement Paper 2

Housing



**Ards and
North Down**
Borough Council

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1.0 INTRODUCTION

- 1.1 This technical supplement is one of a number of topic-based documents detailing the evidence base used to inform the preparation of the Ards and North Down Local Development Plan (LDP) draft Plan Strategy 2017-2032. 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 each policy.
- 1.2 In May 2019, the Council launched the Preferred Options Paper (POP), the first of 3 public consultation documents which will 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 This technical supplement builds upon and updates the POP Housing position paper and, along with the full suite of technical supplements, topic papers and associated documents, sets out the evidence base that has formulated the Housing policies in the draft Plan Strategy. Public consultation processes and engagement with elected members have also been taken into account. It should be noted that this is based upon the best information available at the time of compiling this position paper. Amendments may be required as new data becomes available or as a result of any changes in policy or guidance.

2.0 PLANNING AND HOUSING

- 2.1 Planning for future housing growth is one of the core functions of the Local Development Plan (LDP). Housing provision supports population growth and therefore provides a foundation for the delivery of health and education services, community facilities, infrastructure and other services.
- 2.2 Housing is recognised in the RDS as a key driver of physical, economic and social change in urban areas. Housing continues to exert the greatest pressure on the Borough's land resource, and it is likely to continue to be the most widespread urban land use change for many years to come. Therefore, the relationship between the quantum and location of housing, employment, services and infrastructure is crucial if growth is to be sustainable.
- 2.3 The LDP has a central role in facilitating sufficient housing to support the economic growth ambitions of the Council and meet the full range of housing need over the Plan period. This

growth shall be managed to achieve sustainable patterns of development in those locations which can best support it.

- 2.4 The policy approach of the Plan Strategy will help deliver a variety of high quality, sustainable residential environments to meet the housing needs of everyone and support the creation of balanced communities.

3.0 REGIONAL POLICY CONTEXT

Programme for Government 2024-2027

- 3.1 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 cross-cutting commitment to peace. Particularly relevant to housing is an immediate priority to 'providing more social, affordable, and sustainable housing'.

Draft Programme for Government 2016-2021

- 3.2 The previous draft Programme for Government 2016-2021 was the most up to date expression of the highest level of policy from the Northern Ireland Executive during much of the preparation of the draft Plan Strategy.
- 3.3 It set out 14 strategic outcomes, some of which had implications for the delivery of housing. Of particular relevance were:
- Outcome 2 (We live and work sustainably - protecting the environment); and
 - Outcome 12 (We have created a place where people want to live and work, to visit and invest).
- 3.4 Linked to the Programme for Government, good quality housing can help reduce fuel poverty, promote the use of renewable energy and assist economic growth.

Regional Development Strategy 2035

- 3.5 The RDS provides an overarching strategic framework for Northern Ireland comprising of Regional Guidance and Spatial Framework Guidance. Regional Guidance in the RDS seeks to build sustainable communities as places where people want to live, work and play, now and in the future.

In relation to housing, RG 6 aims to 'strengthen community cohesion' by encouraging mixed housing developments so neighbourhoods have a range of housing types and tenures to support balanced communities.

- 3.6 RG 7 aims to 'support urban and rural renaissance', through developing innovative ways to bring forward under-utilised land and buildings particularly for mixed use development; promote regeneration in areas of social need; ensure that environmental quality in urban areas is improved and maintained, particularly with adequate provision of green infrastructure; and reduce noise pollution.
- 3.7 RG 8 seeks to 'manage housing growth to achieve sustainable patterns of residential development'. In this guidance it is recognised that in settlements, policy should: promote more sustainable housing development within existing urban areas and sets a regional target of 60% of new housing to be located in appropriate 'brownfield' sites within the urban footprints of settlements greater than 5,000 population. Within Ards and North Down, as per the most recent 2021 Census results, this includes the settlements of Bangor (population 64,122), Newtownards (29,591), Holywood (10,735), Comber (9,512) and Donaghadee (7,320).
- 3.8 In line with the RDS, Councils should ensure an adequate and available supply of quality housing to meet the needs of everyone; and use a broad evaluation framework to assist judgements on the allocation of housing growth.
- 3.9 The Spatial Framework identifies Bangor and Holywood as forming part of the Belfast Metropolitan Urban Area (BMUA) and identifies Newtownards as a Hub and a key commuter town to Belfast.

Strategic Planning Policy Statement (SPPS)

- 3.10 The Strategic Planning Policy Statement (SPPS) was published by the Department of the Environment (DOE) in September 2015. The regional strategic objectives are aligned to those in the RDS.

Regional strategic policy aims to facilitate an adequate and available supply of quality housing to meet the needs of everyone; promote more sustainable housing development within existing urban areas; and the provision of mixed housing development with homes in a range of sizes and tenures. Thus, supporting the need to maximise the use of existing infrastructure and services, and the creation of more balanced sustainable communities.

- 3.11 The SPPS (para 6.139) guides that the LDP housing allocation should be informed by:
- RDS Housing growth Indicators (HGIS);
 - Use of the RDS housing evaluation framework, which takes account of the varying capacities of settlements;

- Allowance for existing housing commitments, dwellings which are already constructed, approvals not yet commenced and residential proposals likely to be approved;
- Urban capacity studies which assess the potential for future housing growth within the urban footprint and the capacity for different types and densities of housing (further detail on the Urban Capacity Study is contained in Technical Supplement 2B);
- Allowance for windfall housing – an estimate of potential housing sites that were neither zoned nor anticipated during the formulation of the LDP, but which become available during the lifetime of the plan (see Urban Capacity Study 2B);
- Application of a sequential approach and identification of suitable sites for settlements of over 5000 population. This prioritises the provision of housing within existing urban areas through the re-use of land and buildings. The SPPS accepts that it may be applicable below the stated threshold of 5000;
- Housing Needs Assessment/Housing Market Analysis (HNA/HMA). The Northern Ireland Housing Executive (NIHE) commissioned a Strategic Housing Market Analysis (SHMA). The SHMA projects new dwelling requirements for various Housing Market Areas by tenure from 2020-2035. The projections cover a 15-year period to align with council LDPs; and
- Transport Assessments – to be carried out when considering sites for residential use to best achieve integration with public transport and alternatives to the private car.

Planning Policy Statements and Supplementary Planning Guidance

3.12 Planning Policy Statement 7 'Quality Residential Environments' (PPS 7) sets out planning policies for achieving quality in new residential development and advises on the treatment of this issue in development plans.

3.13 The main objectives of PPS 7 are:

- To promote an integrated approach to achieving sustainable and quality residential environments.
- To promote quality residential development that:
 - creates places for people which are attractive, locally distinctive and appropriate to their surroundings, safe, convenient, adaptable and easy to maintain;
 - respects and enhances features of value and local character and promotes biodiversity; and
 - reduces reliance on the private car, supports movement by pedestrians and cyclists, provides adequate and convenient access to public transport and connects well with the wider locality.

- To promote the comprehensive planning and development of residential areas and ensure that adequate information accompanies planning applications which will enable the delivery of an improved design quality.
- To ensure that adequate provision is made for infrastructure and appropriate local neighbourhood facilities as an integral part of residential development.

- 3.14 The Addendum to Planning Policy Statement 7 'Residential Extensions and Alterations' is to be read alongside PPS 7. It sets out additional planning policy for the extension and/or alteration of a dwellinghouse or flat, including those in multiple occupancy. It seeks to promote high quality design in residential extensions and alterations as well as ensuring the character of the original property and the local area are respected. The policy also seeks to ensure that neighbouring residential amenity is protected.
- 3.15 A second Addendum to Planning Policy Statement 7 'Safeguarding the Character of Established Residential Areas' is also designed to be read in conjunction with the preceding policy statements. It provides additional planning policy provisions on the protection of local character, environmental quality and residential amenity within established residential areas, villages, and smaller settlements. It sets out policy on the conversion of existing buildings to flats or apartments. The addendum also contains policy to promote the greater use of permeable paving within new residential developments to help reduce the risk of flooding from surface water run-off.
- 3.16 Planning Policy Statement 12: Housing in Settlements (PPS 12) sets regional policy objectives in support of the RDS in terms of:
- managing housing growth in response to changing need;
 - directing and managing housing growth to achieve more sustainable patterns of residential development;
 - promoting a drive for more housing within urban areas;
 - encouraging increased density of urban housing appropriate to the scale and design of settlements; and
 - encouraging the development of balanced local communities.
- 3.17 PPS 12 sets out guidance for plan making including: allocating housing land; measures to be included in development plans; and implementing, monitoring and reviewing plans. It also sets out a number of planning control principles for housing in settlements relating to: increased housing density without town cramming; good design; sustainable forms of development; and balanced communities.
- 3.18 Planning Policy Statement 21: Sustainable Development in the Countryside (PPS 21) sets out planning policies for development in the countryside i.e. outside of settlement limits. It seeks to strike a balance between the need to protect the countryside from unnecessary or

inappropriate development, while supporting rural communities. It sets out a range of types of residential developments which are in principle considered to be acceptable in the countryside and that will contribute to the aims of sustainable development.

3.19 Supplementary Planning Guidance:

- **Creating Places: Achieving Quality in Residential Developments** (DOE, DRD, 2000). The guidance is intended for use by all those involved in the design of new residential developments and rejuvenation of existing housing areas and sets out the contributions to quality and sustainability that are expected in new proposals;
- **Building on Tradition: A Sustainable Design Guide for the Northern Ireland Countryside** (DOE, 2012). The guide promotes quality and sustainable building design in Northern Ireland's countryside;
- **Living Places: An Urban Stewardship and Design Guide for Northern Ireland** (DOE, 2014). The guide aims to establish key principles behind good place making, informing and inspiring all those involved in the process with a view to raising standards across Northern Ireland.
- **Development Control Advice Note 8: Housing in Existing Urban Areas¹** (DOE, 2002). This DCAN provides advice to help ensure that urban and environmental quality is maintained, amenity preserved, and privacy respected when proposals are being considered for new housing development within existing urban areas.

4.0 LOCAL POLICY CONTEXT

The Big Plan for Ards and North Down 2017-2032

- 4.1 'The Big Plan' or the Community Plan, provides 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.
- 4.2 The Big Plan contains five outcomes that the Plan hopes will reflect the position of the borough by 2032, that all people in Ards and North Down benefit from:
- opportunities to fulfil their lifelong potential (Outcome 1)
 - being equipped to enjoy good health and wellbeing (Outcome 2);
 - communities where they are respected, are safe and feel secure (Outcome 3);
 - a prosperous and inclusive economy (Outcome 4);
 - an environment that is valued, well-managed and accessible (Outcome 5).

¹ This guidance shall not be retained and will therefore cease to have effect once the Council adopts its Plan Strategy.

- 4.3 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 LDP will work in tandem with 'The Big Plan' providing the spatial framework to achieve the shared vision for the Borough.

Ards and North Down Corporate Plan 2024-2028

- 4.4 The Corporate Plan is aligned to the aspirations of the Borough's Community Plan and serves as the Council's strategic framework for 2024-2028, setting out the vision to be 'A Sustainable Borough'.
- 4.5 The plan is driven by three priorities based upon the pillars of sustainable development:
- Economic - Increasing economic growth attracting more jobs and businesses.
 - Environmental - Reducing carbon emissions as we transition to net zero.
 - Social – Improving wellbeing through social inclusion and reduced inequalities.
- These priorities are supported by seven outcomes and 17 strategic actions.
- 4.6 The approach to housing within the Plan Strategy supports the social priority as it aims to create balanced communities with high quality, sustainable residential environments to meet the housing needs of everyone. Furthermore, the agreed employment-led approach to the housing allocation will support increased economic growth in line with the economic priority.

Ards and North Down Corporate Plan 2024-2028: A Sustainable Borough

- 4.7 The priorities of the corporate plan are closely aligned to those within '[The Big Plan](#)', and set 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](#)'.
- 4.8 The plan is driven by three corporate priorities: economic, environmental and social and linked to seven outcomes the Council wants to achieve.

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

- 4.9 The Integrated Strategy presents a vision for the pursuit of prosperity in the Borough of Ards and North Down. One of the main targets of the Strategy is to grow the number of jobs in the Borough by 7500 by 2030. It also seeks to increase economic productivity and boost tourism through increasing visitor overnight trips and expenditure.

5.0 EXTANT AREA PLANS

- 5.1. The Ards and Down Area Plan 2015 (ADAP) is the extant development plan for the former Ards area.
- 5.2. The Belfast Metropolitan Area Plan (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 (NDAAP) 1984-1995, the Belfast Urban Area Plan, and Bangor Town Centre Plan 1995 are now the statutory Development Plans for the North Down area. Draft BMAP remains an emerging plan and, as such, the draft plan, along with representations received to the draft plan and PAC Inquiry Reports, remain as material considerations.
- 5.3. ADAP and the extant area plans for the North Down area will remain extant until replaced by the new Local Development Plan (LDP) for the Borough. These plans and draft BMAP are important considerations in the LDP process, as they provide a starting point for the review of our spatial planning options.

Draft Belfast Metropolitan Area Plan 2015

- 5.4 Volume 7 of draft BMAP 2015 sets out policies for (former) North Down District. These policies were developed in the context of the Plan Strategy and Framework contained in Volume 1 of the Plan and are in general conformity with the RDS.
- 5.5 Draft BMAP allocated a total of 186ha of land to be zoned and designated for housing across the former North Down district, including approximately 165ha in Bangor and some 10ha in Holywood. The draft plan also designated 'Protected Town Centre Housing Areas', with accompanying strategic policy to protect specific areas of existing housing within the designated town centres of Bangor and Holywood.
- 5.6 Draft BMAP also contained strategic policy for housing including:
 - Social Housing;
 - City and Town Centre Living;
 - Protected Housing Areas in City and Town Centres;
 - Conversion of Buildings for Multiple Occupation; and
 - Accommodation for the Travelling Community.

Ards and Down Area Plan 2015

- 5.7 The Ards and Down Area Plan 2015 (ADAP) zoned 317 ha of land across the former Ards Borough. The majority of the housing allocation was located in Newtownards with c. 207ha designated for housing, equating to 4500 dwellings. Comber had an allocation of 1700

dwellings on c. 68ha and Donaghadee an allocation of 1000 units on 42ha. The villages were deemed to have potential for a further 2,300 dwellings within their settlement limits.

- 5.8 ADAP also designated 'Protected Housing Area's within the town centres for Newtownards, Comber and Donaghadee, accompanied by strategic policy to resist proposals for redevelopment or change of use that would result in a loss of housing in these areas.

6.0 CROSS BOUNDARY CONTEXT

- 6.1 Throughout the LDP process it has been important to take the position of other councils and particularly our neighbouring councils into account. Ards and North Down Borough is bounded by Belfast City, Lisburn and Castlereagh City and Newry, Mourne and Down Council areas, each of which is at different stages in the formulation of their own LDP.

Table 1: Neighbouring Councils Position on Housing

Neighbouring Council	Development Plan Document	Position
Belfast City Council (BCC)	Plan Strategy (adopted)	BCC set a requirement of 31,600 new homes over the 15-year plan period from 2020-2035. In terms of allocation, it projects that Belfast city centre will deliver 8,000 units, Belfast Harbour estate will deliver 3,500 units, and the rest of Belfast city will deliver 18,100 units. Small settlements are projected to deliver 60 units.
Lisburn and Castlereagh City Council (LCCC)	Plan Strategy (adopted)	LCCC puts forward an overall strategic housing allocation figure of 11,550 units to be sourced from existing commitments and allowing for strategic housing growth (to support economic proposals) at West Lisburn
Newry, Mourne and Down District Council	Draft Plan Strategy (published June 2025)	NMD sets out an allocation of between 12,025 and 12,863 over the period 2020-2035. The allocation includes a non-delivery allowance and the range reflects the potential for the delivery of Phase 2 zoned sites (at Downpatrick and

		Ballynahinch.) The distribution seeks to deliver approximately 61% of the district's housing within its city and towns.
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- 6.2 The Council has responded to neighbouring Councils' POPs and the draft Plan Strategies for Belfast and Lisburn and Castlereagh as they were published and will respond to the Newry, Mourne and Down consultation on their draft Plan Strategy.
- 6.3 In addition, the Council is also represented on a number of working groups to discuss cross boundary issues, for example the Metropolitan Area Spatial Working Group and the Development Plan Working Group.
- 6.4 Most recently, online engagement on the Council's draft Plan Strategy was held with the three neighbouring councils in March 2025. This included discussion around the proposed growth strategy, strategic housing and employment land allocation, settlement hierarchy, strategic approach to climate change and mitigation, alongside operational policies. This included the identification of specific cross-boundary issues.
- 6.5 In light of the ongoing engagement with neighbouring councils, the Council does not consider that there is any conflict between their position and that of the draft Plan Strategy insofar as it relates to housing.

7.0 PROFILE OF HOUSING IN ARDS AND NORTH DOWN

Demographics

- 7.1 At the time of the 2021 Census, the population of Ards and North Down was 163,659; an increase of 4.5% since 2011 and the 4th largest Local Government District by population share. NISRA's 2018 sub-national population projections estimate that the population will increase to 164,939 by 2032.
- 7.2 Approximately 90% of the Borough's population lives within its settlements with 10% usually resident in the countryside. 58% of the population lives within the principal settlements of Bangor and Newtownards.
- 7.3 The population of the Borough is aging – as it is across NI. In 2011, 18% of the population was aged 65 and over. This rose to 22% in 2021 – the highest percentage of the population of any local government area in NI. In contrast, the population aged 0-14 was 17%, a decrease of 1% compared to 2011 and the lowest percentage of the population of any local

government area in NI. There was also a 3% decline in the population aged 15-39 (27% in 2021 compared to 30% in 2011), and a 1% decline in the population aged 40-64 (34% in 2021 compared to 35% in 2011). An aging population has implications for service provision – particularly health and community services. Conversely, a decline in young people also has implications for education provision. An aging population also typically leads to lower average household sizes.

Households

- 7.4 As per the 2021 Census, the number of households within Ards and North Down has increased to 70,445 – up 9% from the 2011 Census². The average household size was calculated to be 2.3³ persons per household, below the NI average of 2.44. 66% of all households in 2021 were home to 2 or less usual residents, an increase of 4% from 2011.
- 7.5 The 2016 projection estimated that there would be 67,428 households in the Borough by 2021⁴. An underestimation by some 3,017 households.

Tenure

- 7.6 Ards and North Down has a high level of owner-occupied households at 72% compared with the NI average of 65.2%⁵. This is a decrease of 3% from 2011 when 75% of households were owner-occupied and mirrors a similar decrease in the NI average.
- 7.7 Social rented and private rented each account for 13% of household tenure. Social rented tenure is up 2% from 2011 and private rented is down 1%. Both the social and private rented tenures comprise less than the NI average for each tenure type of 15%.

² <https://explore.nisra.gov.uk/area-explorer-2021/N09000011/>

³ <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-demography-and-households.pdf>

⁴ <https://www.nisra.gov.uk/publications/northern-ireland-household-projections-2016-based>

⁵ <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-2-statistical-bulletin-housing-people-in-households.pdf>

Housing Types

Table 2: Comparison of housing stock in Ards and North Down and whole of NI (NISRA⁶: 2021)

Geography		All Households	Detached	Semi-detached	Terraced (inc end terrace)	Flat, maisonette or apartment ⁷	Caravan, other mobile or temporary structure
ANDBC	Units	70,444	26,577	22,227	14,076	7,432	132
	%⁸		38%	32%	20%	11%	<1%
NI	Units	768,812	289,974	228,545	171,949	77,257	1,087
	%⁹		38%	30%	22%	10%	<1%

- 7.8 Table 2 shows that detached dwellings comprise 38% of the housing stock in the Borough – in line with the NI average. Semi-detached dwellings are 2% above the NI average, and flats/apartments are also slightly above average. Terraced dwellings are slightly below the average for NI.

Housing Size

- 7.9 Given the aging population, accompanying reduction in the number of children and reducing average household size, this would appear to indicate a need for smaller homes in the future. However, this does not account for personal choice as many smaller households may wish to live in a larger home. It should also be noted that to achieve the Council's ambition of growing the number of jobs in the Borough, the provision of family homes will be necessary.

Adaptations

- 7.10 According to the 2021 Census, 8% of all dwellings had been adapted for internal wheelchair usage, 6% had been adapted externally for wheelchair use and a further 7% had been adapted in some way for other physical or mobility difficulties. 1% of dwellings

⁶ <https://www.nisra.gov.uk/publications/census-2021-main-statistics-housing-and-accommodation-tables>

⁷ Includes flats, maisonettes and apartments that are purpose built, those that are part of a converted or shared house (including bedsits) and those located within a commercial building e.g. an office building, hotel, or over a shop.

⁸ Percentages have been rounded

⁹ Percentages have been rounded

had been adapted for visual or hearing difficulties. The total proportion of dwellings adapted or designed in some form was 16%.

House Prices

- 7.11 According to the House Price Index¹⁰ – produced by Land & Property Services/Northern Ireland Statistics & Research Agency (LPS/NISRA), the standardised house price in Ards and North Down for Q1 2025 is £209,479. This is well above the NI average of £184,530 and the second highest standardised house price in NI for the quarter, after Lisburn and Castlereagh at £220,454.

Table 3: Comparison of standardised house prices in Ards and North Down against NI average from Q1 2021 to Q1 2025 (Source: Department of Finance)

	Q1 2021	Q1 2022	Q1 2023	Q1 2024	Q1 2025
AND	£163,437	£177,164	£181,762	£198,050	£209,479
NI	£141,087	£155,086	£162,479	£169,060	£184,530

- 7.12 Table 3 shows a steady increase in house prices from Q1 2021 to Q1 2025, and an overall increase of 28%.

Private Rental Market Trends

- 7.13 According to the most recent Northern Ireland Rental Index report produced by Ulster University¹¹, the average monthly private market rent for Ards and North Down in the second half of 2024 was £994, second only to Belfast at £1,011. For comparison, the figure of £994 is an annual increase of 7.9% from the second half of 2023 which saw an average monthly rental of £921. Looking at trends outside the Belfast City Council area, the average monthly rent for this period was £797. Most council areas exhibit modest to strong growth in the average monthly rents compared to the previous year.
- 7.14 Unsurprisingly, this translates to affordability issues and the report sets out that rents continue to comprise a growing share of household income. The affordability pressure is intensifying across NI with median rent comprising 40% of median household income.
- 7.15 It is observed that the rental index outpaces that of house price growth, as seen in Figure 1, demonstrating ongoing volatility.

¹⁰<https://www.finance-ni.gov.uk/publications/ni-house-price-index-statistical-reports>

¹¹ 'Performance of the Private Rental Market in Northern Ireland' H2 2024 (University of Ulster)
<https://www.ulster.ac.uk/research/topic/built-environment/research-property-planning/housing-market-reports/rental-index#>

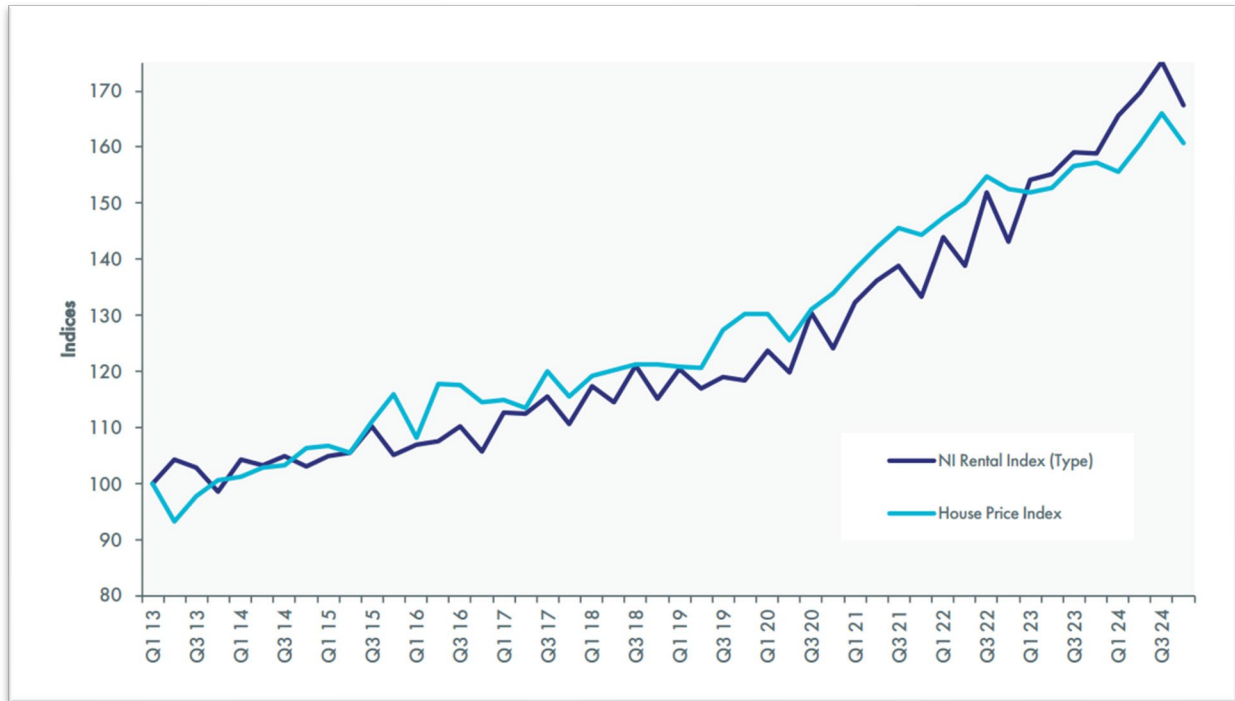


Figure 1 Rental Index v House Price Index, Q1 2013 – Q4 2024 (Source: ‘Northern Ireland Rental Index report’ Ulster University, 2024)

Affordable Housing Need

- 7.16 The SPSS defines affordable housing as:
- a) Social rented housing; or
 - b) Intermediate housing for sale; or
 - c) Intermediate housing for rent that is provided outside of the general market, for those whose needs are not met by the market.

Social Rented Housing

- 7.17 As of March 2023, there were 3,257 applicants on the waiting list for Ards and North Down, 2,267 of whom were in housing stress¹². There were 16 new social homes completed in year to March 2023, with another 162 on-site. A further 158 units are programmed to start over the next three years.
- 7.18 Projected social housing need (general needs) is consistently high within the Borough and is projected to be 1,390 units for 2023-2028. Table 4 shows the breakdown by settlement.

¹² Commissioning Prospectus Social & Intermediate Housing Requirements for the period 2024/25 - 2026/27 (NIHE).

Table 4: Five Year Projected Social Housing Need 2023-28 (Source: Commissioning Prospectus, NIHE)

Settlement	Housing Need Assessment Area	Total 5 Year Projection
Newtownards Town	Newtownards Town	209
Bangor Urban	Bangor Urban	600
Holywood	Holywood	193
Comber	Comber	163
Donaghadee	Donaghadee	60
Groomsport	Groomsport	36
Ballygowan	Ballygowan	15
Portaferry	Portaferry	20
Ballywalter	Ballywalter	15
Crawfordsburn	Crawfordsburn	14
Killinchy	Killinchy	10
Millisle	Millisle	15
Remaining Settlements (need <10) ¹³		40
Total	Ards and North Down	1,390

- 7.19 As of March 2023, there were 319 applicants in rural Ards and North Down in housing stress – 14.1% of the total. Based on the waiting list for social housing, as of March 2023 the projected need for rural areas in Ards and North Down is 165 units. Rural housing need can be localised in nature and is often evidenced by specific rural housing need testing by NIHE including assessment of ‘hidden’ or ‘latent’ demand.

Wheelchair Housing Need

- 7.20 The latest figures from NIHE¹⁴ show that as of March 2023 there was an outstanding requirement for 104 applicants requiring wheelchair accessible housing. This need is dispersed throughout the Borough.

¹³ Remaining settlements include Ballyhalbert, Carrowdore, Cloughey, Greyabbey, Helen’s Bay, Kircubbin, Loughries and Portavogie where each settlement is less than ten. Housing need has currently been met in Ballydrain, Cotton and Lisbane.

¹⁴ Commissioning Prospectus Social & Intermediate Housing Requirements for the period 2024/25 - 2026/27 (NIHE).

Traveller Accommodation

- 7.21 No current need has been identified by NIHE in its Commissioning Prospectus 2024/25 - 2026/27, but need within the community will continue to be monitored.

Intermediate Demand

- 7.22 NIHE estimates intermediate housing demand for the Borough currently sits at approximately 70 units per annum.

8.0 EVIDENCE BASE FOR HOUSING

- 8.1 The purpose of this section is to set out the data sources that inform the evidence base for housing in the LDP, including research and survey work, studies and modelling.

AND Housing Land Availability Study (Housing Monitor)

- 8.2 The Planning Act (NI) 2011 requires the Council to make an annual report to the Department for Infrastructure (DfI) reviewing the extent to which the objectives of the LDP are being realised. As the Council is currently preparing the first LDP for the Borough, the submission of Annual Monitoring Reports to the Department is not yet required under the terms of the legislation. However, the annual Housing Monitor is also a key component of the evidence base for housing for the LDP.
- 8.3 The SPPS supports a 'plan, monitor and manage' approach to ensure that, as a minimum, a 5-year supply of housing land is maintained. The SPPS sets out that monitoring must include:
- The housing land supply at the beginning and end of the annual reporting period;
 - The number of net additional housing units built during the annual reporting period; and
 - The number of net additional housing units built in the period since adoption of a Local Policies Plan.

The SPPS also states that it will be necessary to monitor and assess housing development in the rural area to ensure that total housing supply can be assessed against the housing allocation.

- 8.4 The annual Housing Monitor provides information on annual building rates, housing output relative to planned densities and also gives a useful indication of the validity of windfall predictions. It facilitates the identification of any issues in potential housing land supply and can provide clarity and certainty to developers in relation to the availability of land suitable for housing. It will also allow for the identification of any concerns which are likely to require

intervention; for example, the need to release phased housing sites in order to maintain a 5 year supply of available housing land, or the release of a site to provide for a particular housing need.

- 8.5 Prior to the transfer of planning functions to local councils in 2015 as part of local government reform, DOE was responsible for monitoring housing delivery annually, including for the two legacy councils of North Down and Ards.
- 8.6 The Housing Monitor for Ards and North Down comprises a survey of all live housing sites resulting in a net gain throughout the Borough – both within settlements as defined in extant development plans and in the countryside. This includes all previously monitored sites which are not yet complete, new residential sites, and sites zoned for residential development in extant and emerging development plans. Sites with planning permission that expired prior to 2022 without commencing are now not physically monitored. These sites are now under an archive status retained within the Housing Monitor Database for information purposes but are not included in any summary data tables.
- 8.7 The Council data is not directly comparable to that of previous monitoring information published by the DOE for a number of reasons, namely:
- 1.4 The previous methodology has been reviewed and the efficiency and accuracy improved by moving to a GIS based system to record and analyse the survey results;
 - Differences in the approach to the ‘survey year’ with the Council’s approach mirroring the financial year from 1 April to 31 March compared to the historical monitoring period which operated from 1 August to 31 July.
 - Differences in the geographical extent of the monitor (due to the revision of council administrative boundaries during local government reform); and
 - A four-year break in the monitoring records, with the last report from DOE published in 2013 and the re-commencement of monitoring in Council taking place in 2017 following the formation of the LDP team¹⁵.
- 8.8 The Council recommenced monitoring housing completions within settlements in 2018, however the first year yielded an artificially inflated completions number as it captured multiple years of completions. The 2018 survey results are therefore viewed as a baseline year.
- 8.9 The 2019 housing monitor surveyed completions within the countryside for the first time. The initial survey of dwellings built within the countryside included all planning approvals for residential development outside settlement development limits from 1 January 2010. This

¹⁵ Due to the time period which elapsed without monitoring taking place, the first AND Housing Monitor in 2017 captured completions which pre-dated the Plan period commencing on 1 April 2017. Therefore, the Council has relied upon Building Control data to gain a more accurate position on the completions for the first monitoring year 1 April 2017 – 31 March 2018.

allowed the 2019 survey to form a baseline for future analyses of dwellings built within the countryside.

8.10 The most recently completed housing monitor was reported upon in December 2024 and covered the period from 1 April 2023 to 31 March 2024.

8.11 Table 5 summarises the total completions and remaining potential for the urban area and the countryside.

Table 5: Housing Land Availability 2023-2024 total completions and remaining potential urban v rural

	Completions		Remaining Potential	
	Units	Area (Ha)	Units	Area (Ha)
Urban Total	366	16.65	6893	339.14
Countryside Total	41	N/A	287	N/A
Total	407	N/A	7180	N/A

8.12 Table 6 shows a summary of the dwellings built and the area of land developed in each of the primary settlements and towns. It also shows the remaining potential in the housing monitor in terms of dwelling units and area of land. This remaining potential is derived from existing commitments in respect of live planning approvals and zonings from the extant area plans.

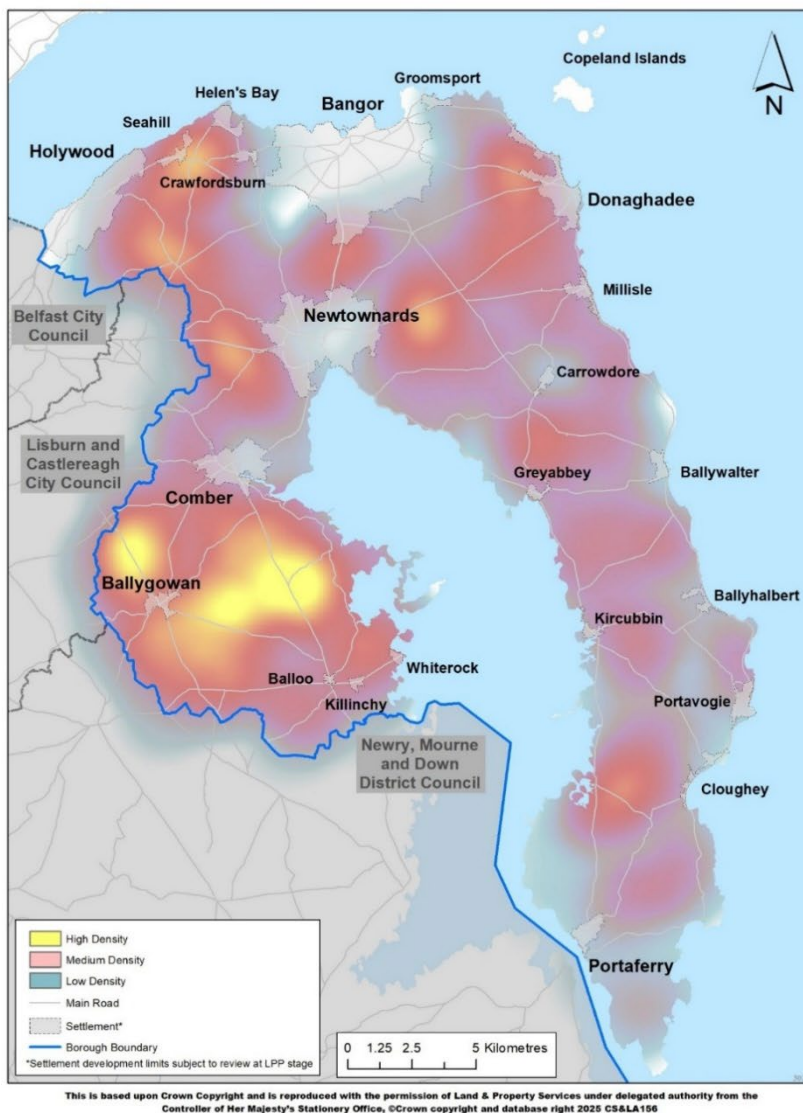
Table 6: Housing Land Availability Study 2023-2024 results (ANDBC)

Housing Land Availability Study 2023-2024	Built		Remaining Potential		
	No.	Area (ha)	No.	Overall %	Area (ha)
Principal Settlements					
Bangor	97	3.55	992	13.82%	36.7
Newtownards	87	3.62	3138	43.70%	150.56
Principal Settlements Total	184	7.17	4130	57.52%	187.26
Small Towns					
Comber	89	4.68	909	12.66%	42.28
Donaghadee	28	1.45	420	5.85%	23.75
Hollywood	8	0.43	173	2.41%	20.16
Small Towns Total	125	6.56	1502	20.92%	86.19
Villages Total	43	1.94	1159	16.14%	57.92
Small Settlements Total	14	0.98	102	1.42%	7.77
Urban Totals	366	16.65	6893	96.00%	339.14
Dwellings in Countryside	41	N/A	287	4.00%	N/A
ANDBC Total	407	N/A	7180	100%	N/A

8.13 The Council's housing monitor is an evolving process and as such the methodology may be subject to further refinement. This may result in the yield for individual sites varying from year to year. However, this is unlikely to have a significant impact on the overall housing land availability. Further information including annual Housing Land Availability Reports and a current map viewer may be found on the Council's website at <https://ardsandnorthdown.gov.uk/article/1708/Housing-Land-Availability>

Rural Housing

- 8.14 As stated at paragraph 8.9, the 2019 housing monitor surveyed completions within the countryside for the first time. As this was the first time it had been completed for the Borough, the initial survey of dwellings built within the countryside included all planning approvals for residential development outside settlement development limits from 1 January 2010.
- 8.15 A heat map to show rural housing pressure between 2010 and 2022 shows areas of the countryside under greatest pressure from housing development.



Map 1 Rural Housing Pressure (housing approvals 2010-2022) (Source: ANDBC)

AND Urban Capacity Study

- 8.16 The Urban Capacity Study (see Technical Supplement 2B) analysed the potential for future housing growth within the primary settlements and towns within the Borough. It also assessed the potential for future windfall. The purpose of the study was twofold - to quantify the future housing potential arising from within the urban footprint of our larger settlements, and to inform the sequential approach for the designation of future housing land at LPP stage. Thus, ensuring that 'brownfield' or previously developed land is prioritised over greenfield sites.

Windfall

- 8.17 The Urban Capacity Study incorporates a windfall assessment. This was based upon a historical analysis of windfall development between 2000 and 2016 and then extrapolated this figure over the future 15-year Plan period, accounting for those windfall sites that would have already been counted as existing commitments and/or completions to avoid double counting.

Strategic Housing Market Analysis (SHMA)

- 8.18 The Strategic Housing Market Analysis (SHMA) projects annualised new dwelling requirements for various Housing Market Areas by tenure until 2035. The SHMA was commissioned by the NIHE with a report into the Belfast Metropolitan Housing Market Area (HMA) produced in late 2020. Ards and North Down sits within the Belfast Metropolitan Housing Market Area which also comprises the LGDs of Antrim and Newtownabbey, Belfast and Lisburn and Castlereagh in their entirety along with the inclusion of substantial parts of Mid and East Antrim (50 per cent in population terms) and Newry, Mourne and Down (36 per cent). The SHMA provides housing requirement projections for 2020-2035 to coincide with 15-year plan periods.
- 8.19 The authors of the SHMA report varied the assumptions behind the NISRA 2016 projections resulting in a medium and a high household growth scenario. They also used the most recent 2018-based population projections, to create an 'updated' set of household projections which gives a lower household growth scenario.
- 8.20 The SHMA is based upon a net stock model which projects future housing requirements from three main components as follows:
- Newly arising need and demand due to projected net growth in the number of households.
 - Existing unmet need, most often referred to as the 'backlog' of unmet need, i.e. the shortfall between current provision and the accommodation needs of existing households as well as individuals or families that have not yet formed as separate households.
 - Accompanying demand (second homes) and supply-side adjustments (vacant dwellings, conversions, etc.).

8.21 Crucially, the SHMA projections also include an analysis of affordability. Tests of affordability were employed to assign the new dwelling requirements to the following tenure categories:

- Market – can afford market rent or has sufficient income to enter and sustain home ownership;
- Intermediate – cannot afford market rent but can afford more than social rent; and
- Social – cannot afford intermediate or market rent.

8.22 As can be seen from Table 7, the SHMA projects net new dwelling requirements for 2020-2035 in the Borough to be 6,020 units (medium household growth scenario, net stock model with backlog) across all tenures over the plan period (401 units per annum). This is broken down as 1500 social housing units and 1060 intermediate units giving a total affordable housing requirement of 2560 units over the 15-year plan period.

Table 7: Medium household growth – new dwelling requirements by tenure 2020-2035, net stock model with backlog (Source: SHMA 2020)

	Market	Intermediate	Social	All
Antrim and Newtownabbey	3,370	910	1,540	5,810
Ards and North Down	3,470	1,060	1,500	6,020
Belfast	5,040	2,090	6,020	13,140
Lisburn and Castlereagh	7,280	2,050	2,680	12,010
Mid and East Antrim (part)	1,190	340	570	2,100
Newry, Mourne and Down (part)	2,250	540	810	3,600
Belfast Metropolitan HMA	22,590	6,990	13,120	42,690

8.23 Whereas the high growth projections consider a scenario of faster than anticipated household growth over the 15-year plan period. In this scenario, the projected dwelling requirements for 2020-2035 rises to 6,800 units. The SHMA does not specifically break down the tenure composition for the high household growth scenario. However, it does include a projected tenure composition by percentages as seen in Figure 2

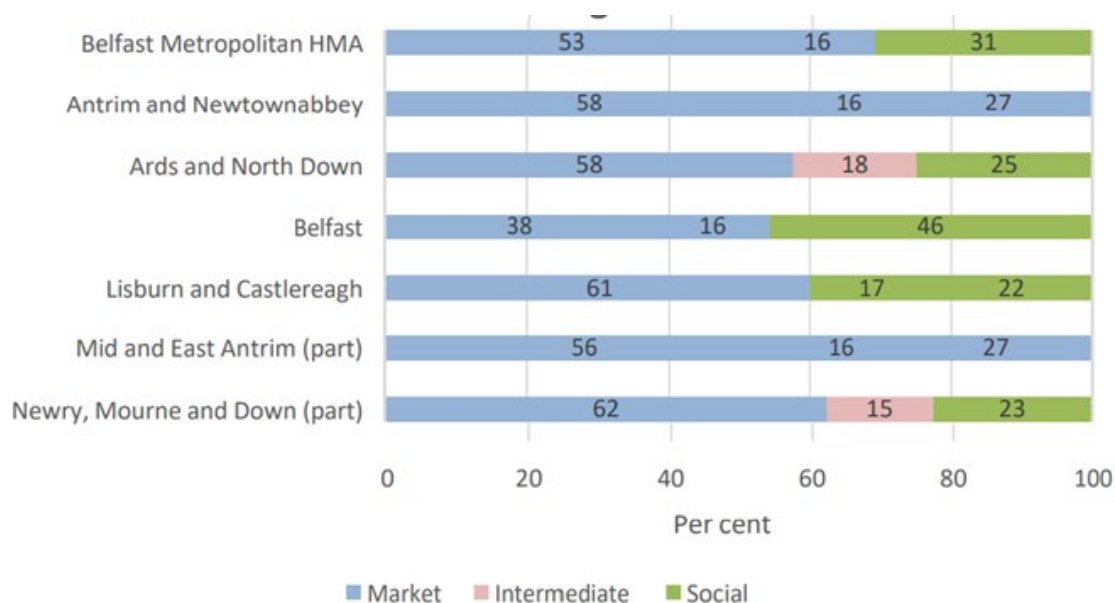


Figure 2 Projected tenure composition of new dwelling requirements by LGD, 2020-2035, with backlog (Source: SHMA, 2020)

8.24 This has been adjusted slightly for ease of calculations to give a projected tenure composition of 57% market, 18% intermediate and 25% social housing. Table 8 below applies these percentages to the high growth household new dwelling requirement of 6800. This indicates that combining the intermediate and social housing categories gives a total affordable housing requirement of 2924 units over the plan period when using the high household growth scenario.

Table 8: Medium and high growth scenario new dwelling requirements by tenure 2020-2035, net stock model with backlog (Source: SHMA 2020)

	Market	Intermediate	Social	Total
Medium growth	3470	1060	1500	6020
High growth	3876	1224	1700	6800

Affordable Housing Supply Analysis

- 8.25 To determine the appropriate threshold and proportion for the draft affordable housing policy, the LDP team used the potential yields from the Urban Capacity Study across all settlements (excluding small settlements). This was broken down into threshold intervals to engage the policy, with sample proportions of affordable housing to determine the likely yield at 10% provision, 15%, 20% and 25%.

Table 9: Potential affordable housing yield of urban capacity sites at threshold intervals (Source: ANDBC)

UC sites potential yield	Potential AH yield at 10%	Potential AH yield at 15%	Potential AH yield at 20%	Potential AH yield at 25%
5-9 units	34	34	45	58
10-14 units	16	32	36	51
15-19 units	16	20	26	34
20-24 units	12	19	26	33
25-49 units	29	42	56	69
50+ units	14	20	28	35
Total	121	167	217	280

- 8.26 Table 9 shows that the majority of the sites identified within the Urban Capacity Study are smaller sites likely to yield between five and nine units. Therefore, to maximise the number of sites from which affordable housing may be sought, a low threshold of five units or more is most suitable. Similarly, a relatively high percentage of affordable housing at 20% or 25% would yield the most affordable housing to meet need within the Borough. This is particularly important given the high level of existing commitments as seen in the Housing Land Availability study.

9.0 PREFERRED OPTIONS PAPER

- 9.1 The Council's Preferred Options Paper, (POP) published in 2019 was the first formal stage in the preparation of the LDP for the Borough. It was designed to promote debate in relation to key strategic planning issues arising in the area. The POP identified 42 key planning issues within the Borough and examined options for addressing these issues. In each case, a preferred option was highlighted and the rationale for selection of this option was given.

- 9.2 The POP also included a review of the existing operational planning policies, largely contained within the suite of Planning Policy Statements. This review stimulated public debate on whether the existing policies are still suitable or whether a different approach would be more appropriate to meet local circumstances.
- 9.3 Following a minor revision to the online version of the POP, the 12-week consultation period was relaunched and therefore the total consultation period from the official launch was 19 weeks.
- 9.4 Key Issues Identified within the POP:
- Key Issue 3: Strategic Housing Allocation
 - Key Issue 6: Rural Housing
 - Key Issue 7: Affordable Housing;
 - Key Issue 8: Lifetime Homes
 - Key Issue 35: Areas of Protected Housing (in Town Centres)

Key Issue 3: Strategic Housing Allocation

- 1.5 The 2016 amended Housing Growth Indicator (HGI) 2012-2025 figure of 7100 was used as the starting point for the housing requirement, extrapolated for the Plan period 2015-2030 to give a total of 8,190 for all options.
- 9.5 The preferred option was to re-evaluate the existing housing zonings and allocate additional housing land, if required, to ensure continued modest housing growth.
- The POP also considered two alternatives:
- Alternative option (a) proposed to maintain existing housing growth through retention of housing zonings in extant plans; and
 - Alternative option (c) proposed to allocate housing land proportionally across settlements based on population size.
- 9.6 The majority of public respondents to issue 3 were not in agreement with the preferred option (71% compared to 24% who agreed). Comments on the issue included concerns that the HGI based allocation of 8,190 units was not adequate to allow the Borough to grow over the life of the Plan period. Concerns were also expressed in relation to higher allocations to larger settlements disadvantaging rural parts of the Borough. There was some support expressed that housing should be in the right place to meet demand however there was some divergence as to where in the Borough the right place would be.
- 9.7 The Department for Infrastructure (DfI) welcomed the commitment to re-evaluate housing zonings and allocate additional land, if required, to ensure continued modest housing growth. DfI also welcomed the acknowledgement that the HGIs are prepared as a guide for

the preparation of the LDP and stressed the importance of any local adjustment of the HGI being based upon robust evidence. DfI also appreciated that in bringing forward the Plan Strategy (PS) the Council must have regard to the provisions of extant area plans and how best to manage the transition to the new LDP system, especially in relation to the application of the updated HGI evidence.

Key Issue 6: Rural Housing

- 9.8 The preferred option was to introduce an approach to rural housing in line with existing policies and regional direction, tailored to meet local circumstances. This approach draws upon the regional strategic direction set out in the SPPS alongside a consideration of how extant rural planning policy currently works in the Borough and identifying where room for improvement exists.
- 9.9 Of those who responded to the relevant question in the POP questionnaire, 48% agreed with the preferred option, 24% disagreed and 27% didn't know.

Key Issue 7: Affordable Housing

- 9.10 The POP presented 4 options to address provision of affordable housing. The preferred option was 'The LDP will provide affordable housing through the use of the proportional approach, Key Site Requirements or zoning of entire sites, dependent on a number of factors, including identified need.' This option combines the other 3 options to enable the most flexibility to deliver appropriate and proportionate sustainable solutions, providing certainty and contributing to the provision of balanced communities.
- 9.11 Of those who responded to the relevant question in the POP questionnaire, 48.48% agreed with the preferred option and 24.24% disagreed and 27.27% didn't know.

Key Issue 8: Lifetime Homes

- 9.12 In response to Key Issue 8, the POP presented 2 options, the preferred option was 'The LDP shall provide a proportion of Lifetime Homes in new developments'. This option requires a proportion of housing development sites, over a certain threshold to be delivered to Lifetime Homes standards. This option will help to meet the varied needs of the community, provide high quality, sustainable housing and a better living environment.
- 9.13 Of those who responded to the question 'Do you agree with the preferred option', 48.65% agreed, 29.73% disagreed and the remaining 21.62% didn't know.

Key Issue 35: Areas of Protected Housing (in Town Centres)

- 9.14 In response to Key Issue 35, the POP presented 2 options, the preferred option was 'Identify areas of existing housing to be protected and promote new housing development, if appropriate to the character of the area, within town centres'. This option allows for the promotion of housing development and the retention of existing housing stock in central areas to take advantage of proximity to existing facilities, services, infrastructure and public transport provision and reduce dependence on private vehicles. This option will also allow the existing Protected Housing areas to be reviewed and amended if appropriate.
- 9.15 Of those who responded to the question 'Do you agree with the preferred option', 82.61% agreed, 4.35% disagreed and the remaining 13.04% didn't know.

10.0 CONSULTEE AND COUNCILLOR ENGAGEMENT

Consultee Engagement

- 10.1 In order to meet the requirements set out in the Planning Act relating to the need for the Plan Strategy to take account of the RDS, other policy and guidance issued by the DfI and other relevant government strategies and plans; Council has engaged key consultees representing relevant central government departments and agencies. The following POP consultation responses were received from key consultees regarding housing
- 10.2 The Department for Infrastructure Strategic Planning Directorate stated that the Council should clarify the position in relation to existing housing potential within the formal ADAP. The Department welcomes the approach to rural housing policy and facilitating affordable housing and stated that Council should consider the implications of the approach to Lifetime Homes on development viability. The Department wished to see greater use of the evidence base in order to provide rationale for the preferred approach to areas of protected town centre housing.
- 10.3 The Housing Executive supported the review of uncommitted housing land to address housing need and stressed the need to monitor the Plan. The Housing Executive believes that the LDP should limit the growth of dispersed single dwellings in the countryside but that the LDP can seek to sustain and support rural communities wishing to see an exception policy similar to CTY5 of PP21 to address instances of rising and unforeseen affordable housing need which cannot be met within the development limit. Support was given for the affordable housing and town centre protected housing policy approaches as well as Lifetime Homes (LTH) however they would like to see all new build homes built to LTH standards with a proportion built to wheelchair standards.

Elected Member and Cross-Council Engagement

- 10.4 The Planning Act requires the Plan Strategy to be adopted by resolution of the Council, following approval by DfL. Accordingly, elected members have been engaged in the development of the draft Plan Strategy, to ensure that the document is generally aligned with Council's strategic priorities. Representatives from Community Planning and other relevant Council departments have also been engaged to ensure that due account has been taken of Council's Community Plan, as well as other Council strategies and initiatives.
- 10.5 An extensive LDP Elected Member Engagement Programme has been carried out ranging from pre-POP capacity building and discussion to virtual workshops on the evolution of the draft planning policies. Attendance was voluntary and varied between events. This engagement was facilitated through a series of in-person workshops held between September 2019 and February 2020. Due to the coronavirus pandemic, the workshops moved to a virtual platform for the remainder of 2020 and 2021. Due to a lack of initial consensus on certain topic areas, two topic focused presentations were also made available to Members.
- 10.6 A draft of the Plan Strategy including the Strategic Housing Allocation and housing policies (for the purposes of progressing to Sustainability Appraisal) was presented to full Council on 28 September 2022.
- 10.7 The Affordable Housing policy was deferred to Planning Committee for further review and for officers to come back with alternative proposals. Following the tabling of a paper on the options to Planning Committee on 01/11/2022, a subsequent deferral was sought for further consideration of the practical implementation of the policy, its impact on the local housing market, and for additional consultation with stakeholders.
- 10.8 At the request of Elected Members, the Affordable Housing policy and supporting evidence was the subject of further debate at Planning Committee in April 2023 and August 2023 before being agreed at the latter meeting.
- 1.6 Post Sustainability Appraisal (SA), a number of amendments to policy were made and brought before Planning Committee for agreement in 2024, with final approval secured at a Special Planning Committee meeting held on 20 January 2025 and ratified at the full Council meeting on 29 January 2025.

Development Management Engagement

- 10.9 The LDP team has worked closely with professional planning colleagues from the Development Management and Enforcement service areas at policy review and POP stage. Post-POP a meeting occurred in February 2020 in advance of workshopping policy with Elected Members in July. The LDP team continues to meet and discuss policy matters including the draft policies for the Plan Strategy on an ongoing basis.

- 10.10 Overall, the feedback was that housing policies as they relate to the urban area are working well. Colleagues agreed with the approach to combine the policies within the addendum to PPS 7 within policy HOU 2. There was much discussion around the draft affordable housing policy HOU 3 and how that will operate in practice – in particular with how provision will be secured going forward in the form of planning conditions or Section 76 agreements with concerns raised as to the time involved in securing the latter. Discussion was also held around the issues of viability.
- 10.11 Colleagues also debated the merits of the new draft policy on accessible and adaptable homes HOU 4 and how that might work in practice. Discussion centred around the need for solutions around sloping sites and examples of housing applications that may previously have incorporated living spaces at first floor level.
- 10.12 In relation to the rural area, there were several areas of concern. There was discussion around the possibility of strengthening the policy on clustering further in draft policy HOU 9. There are several problematic sites whereby rural character has been eroded due to cumulative approvals of single dwellings under the extant policy CTY 2a. However, it was considered too difficult to refuse a valid clustering opportunity where it was otherwise policy compliant.
- 10.13 Points of learning and clarification from case law and appeals were requested in some draft rural policies including those for replacement dwellings and dwellings on farms. Colleagues referenced the change within the SPPS relating to policy for the conversion and reuse of existing buildings that are locally important.
- 10.14 Many colleagues felt strongly that rural character was being eroded in the Borough due to the approval of infill dwellings as exceptions to the extant policy on ribboning in CTY 8. There was a strong consensus that the original intent of the policy was not to create a situation where rural character was being undermined, but to allow for exceptional opportunities for a dwelling (or two) in circumstances where rural character had already been eroded to such a degree that additional dwellings would not result in any harm. There was strong advocacy for a strengthening of the draft policy against ribbon development to include a change to the definition of the substantial and built-up frontage and to reduce the opportunity from two dwellings within a gap site to one dwelling.

11.0 DRAFT PLAN STRATEGY APPROACH

- 11.1 The draft Plan Strategy approach is to facilitate an adequate and available supply of housing to support the growth ambitions of the Council and meet the full range of housing need over the Plan period. This shall be managed to achieve sustainable patterns of development in those locations which can best support it.

- 11.2 The policy approach of the Plan Strategy will help deliver a variety of well-designed, high quality, sustainable residential environments to meet the housing needs of everyone and support the creation of balanced communities.
- 11.3 In rural areas the draft Plan Strategy aims to support rural communities by facilitating sustainable residential development while protecting, conserving and where possible enhancing the rural landscape, seascape, natural and historic environments and promoting high standards in design, siting and landscaping.

Strategic Housing Allocation

- 11.4 The Council's approach towards the Strategic Housing Allocation is set out in SGS 4 of the Spatial Growth Strategy. This position on the overall quantum of housing required in the Borough supports its wider aims in relation to attracting and sustaining the working population required for job creation and to meet the needs of all sections of society.
- 11.5 Historically, Departmental development plans¹⁶ relied upon the use of Housing Growth Indicators (HGIs) to set a housing requirement. These were originally appended to the RDS and have been updated periodically. HGIs are produced to provide an indication of future housing need based on household projections produced by NISRA (Northern Ireland Statistics and Research Agency). HGI figures are a policy-neutral estimate, based on current population and household formation trends with the assumption that these trends will continue into the future.
- 11.6 Since the transfer of majority of planning functions to local councils in 2015, there has been a shift in approach. Whilst some councils still rely on HGIs, others are opting to reflect local circumstances such as the aspirations of their Community Plan and other local growth strategies to set their housing requirement.
- 11.7 A letter from the Department for Infrastructure (DfI) Chief Planner and Director of Regional Planning, dated 25 September 2019, recognised and endorsed this approach, stating: "Rather than accepting the HGI estimate as a target to be planned for, Councils should first consider its applicability to local circumstances in the context of the above-mentioned assessments¹⁷ and other relevant local evidence. This may include, for example, other Council strategies/objectives (for instance in relation to urban regeneration or economic growth); the likely impact of corresponding strategies in neighbouring councils; the capacity of existing or planned infrastructure to facilitate development; or other evidence in respect of recent build rates. This is not an exhaustive overview of the types of local evidence that may be relevant."

¹⁶ Plans produced by the former Planning Authority – Department of the Environment (DOE)

¹⁷ RDS Housing Evaluation Framework; allowance for existing commitments; urban capacity studies; allowance for windfall; application of a sequential approach to site identification; Housing Needs Assessment/Housing Market Analysis and transport assessments.

- 11.8 The Council has therefore considered a number of future housing growth scenarios including:
- Housing Growth Indicators 2016 (HGIIs);
 - Demographic trend led - based on 2018 sub national population projections;
 - Dwelling led - based on historic build rates; and
 - Employment led – based on the level of population growth required to support job creation targets and employment growth.

Housing Growth Options

- 11.9 Table 10 summarises the scenarios which were taken under consideration, showing the quantum of housing growth projected across the plan period and the housing units per annum.

Table 10: Housing Growth Scenarios for Ards and North Down

Housing Growth Scenario	Total housing units 2017-2032 ¹⁸	Housing units (average per annum ¹⁹)
HGI-led	5,500	367
Demographic trend led (SNPP-2018)	4,883	326
Dwelling led (past build rate)	9,219	615
Employment led 'success' scenario	14,189 ²⁰	946
Employment led 'high growth' scenario	10,795 ²¹	720

¹⁸ All figures extrapolated over plan period

¹⁹ All figures rounded

²⁰ See Technical Supplement 2A Ards and North Down Demographic Scenario Output (Edge Analytics)

²¹ See Technical Supplement 2A Ards and North Down Demographic Scenario Output (Edge Analytics)

HGI-led (2016-2030)

11.10 The Revised NI Housing Growth Indicators for 2016-2030²² were published in September 2019 and updated the 2012 base figures. The methodology report accompanying the HGIs states:

..these estimates are purely for guidance and should not be considered as a cap or a target on development and, as such, represent a robust starting point which can be considered while also taking account of the full range of factors that may influence housing requirements over the plan period in terms of how many houses are needed in any area.

11.11 As Table 11 shows, the updated HGI figures set out an estimated dwelling requirement of 5500 units for Ards and North Down Borough Council between 2016-2030 or 367 per annum. This represents a significant reduction from the 2012 based HGIs of 7,100 units (over a 13-year period) which equated to 546 per annum – a reduction in the region of 32%.

Table 11: Estimate of total housing need in Northern Ireland by Council 2016-2030 (Source: DfI Housing Growth Indicators 2016-based)

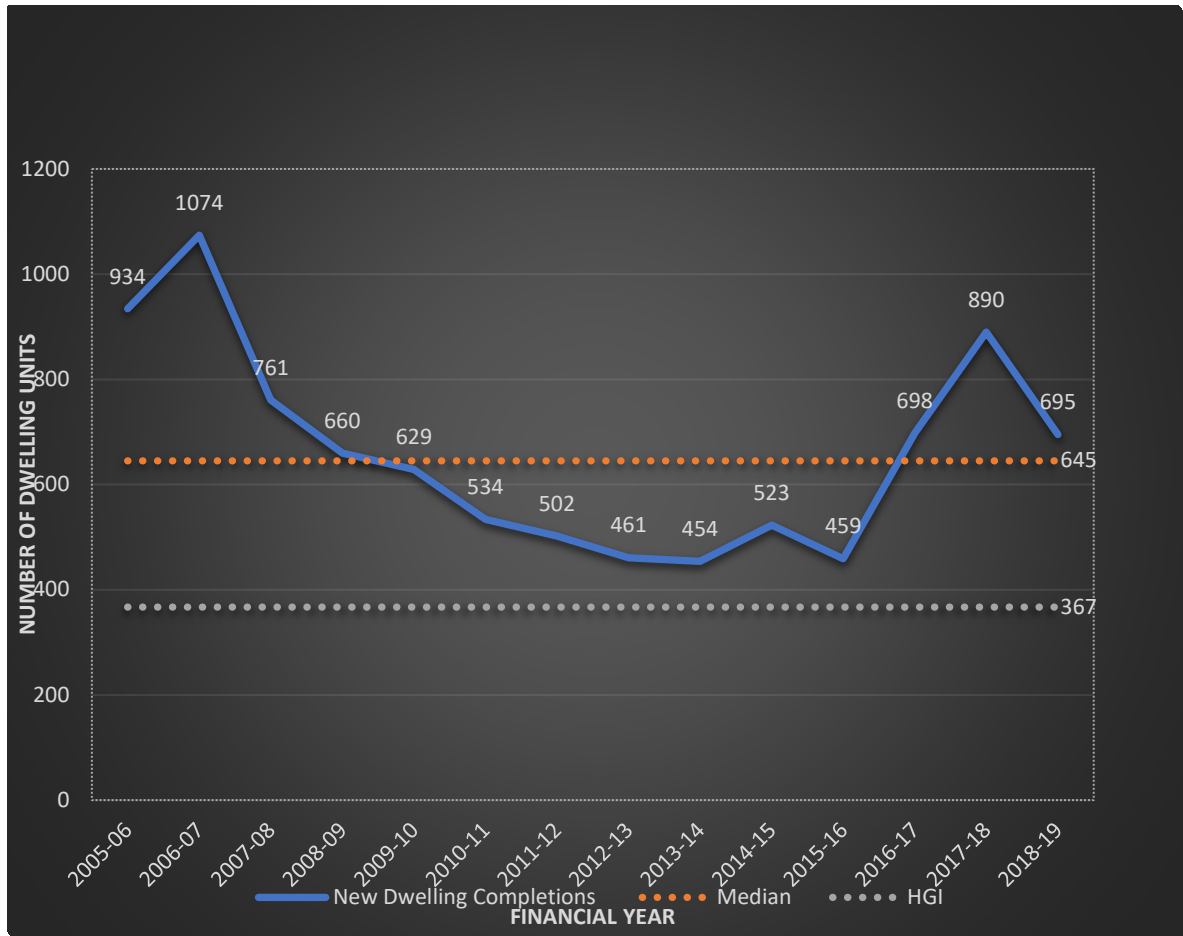
Council / LGD	2030 estimated dwelling requirement
Antrim and Newtownabbey	4,200
Ards and North Down	5,500
Armagh City, Banbridge and Craigavon	17,200
Belfast	7,400
Causeway Coast and Glens	5,600
Derry City and Strabane	4,100
Fermanagh and Omagh	4,300
Lisburn and Castlereagh	10,700
Mid and East Antrim	5,400
Mid Ulster	10,300
Newry, Mourne and Down	10,000
Northern Ireland	84,800

11.12 To support its position, DfI looked at the dwelling completions for the preceding nine years, justifying the HGI's annual overall housing requirement for Northern Ireland as "a broadly central point amongst these nine annual figures and as such the updated HGI figure sits within the recent trend of completions over the past decade."

²² <https://www.infrastructure-ni.gov.uk/publications/2016-based-housing-growth-indicators-hgis>

11.13 This approach at a national level contrasts starkly with local circumstances. The annual build rate for the Borough has not been as low as the amended HGI in the last twenty years. Looking at annual dwelling completions²³ between April 2005 and March 2019, the median figure or ‘broadly central point’ would be 645 dwellings per annum.

Figure 3: New dwelling completions within Ards and North Down by financial year April 2005 to March 2019 (Source: New Dwelling Statistics May 2020, Department of Finance).



11.14 The average build rate over the same period is 662 dwellings per annum. The Council recommenced housing monitoring in 2018. When the results of the monitoring periods from April 2019 – March 2022 are factored in, the average build rate from April 2005 – March 2022 drops to 626 dwellings per annum²⁴.

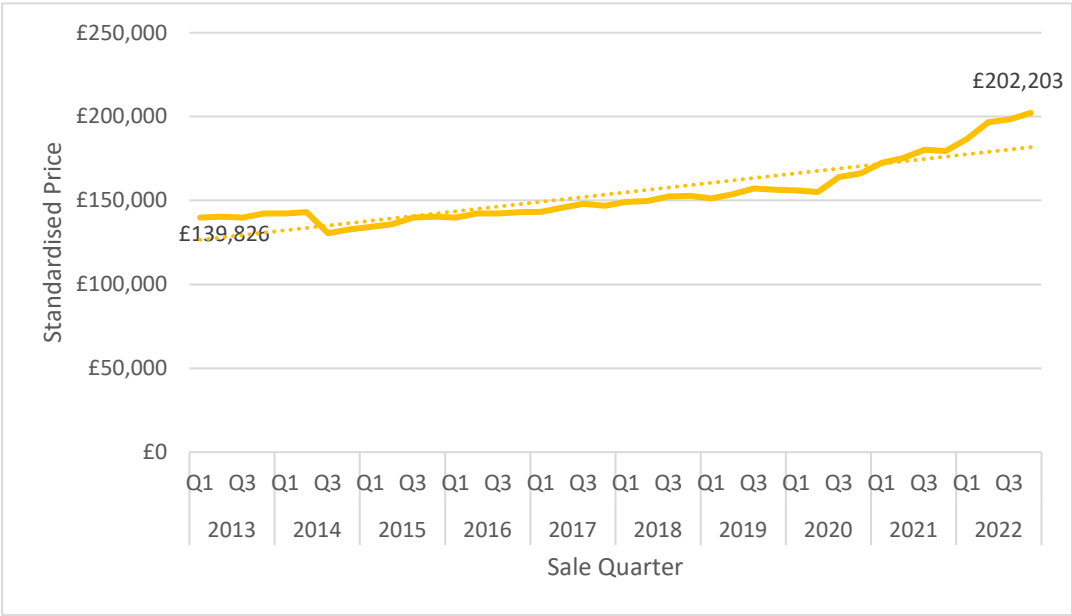
²³ For the purposes of this comparison, the new dwelling statistics from the Department for Finance have been used <https://www.finance-ni.gov.uk/topics/new-dwelling-statistics>

The statistics are sourced from Land and Property Services (LPS) using data from Building Control for each council.

²⁴ This may be due in part to the difference in methodologies between the Council’s housing monitoring and that used to record building control completions.

- 11.15 At an average rate of build of 626 dwelling units per annum, the HGI figure of 5500 will be surpassed in 2026 - the ninth year of the plan. This highlights the incompatibility between the HGI and local circumstances and furthermore, does not allow for the maintenance of a five-year supply of available housing land as required by paragraphs 6.140 and 6.141 of the SPPS.
- 11.16 There is no evidence of an oversupply of housing within the Borough. Were the HGI to be an accurate projection, indicating that at the current build rate there was an oversupply of housing, one might expect to see evidence within the housing market of falling house prices or a fall in house sales. However, neither of these are evidenced.
- 11.17 As Figures 4 and 5 show, with the exception of 2020 which saw a drop in total numbers of verified house sales across the country followed by a larger uplift the following year, there has been a steady upward trend²⁵ since the recovery of the housing market from 2013 onwards both in the number of house sales and in the average house price in the Borough.

Figure 4: Ards and North Down Standardised House Price (Source: NI House Price Index detailed statistics Quarter 2 2023)



²⁵ <https://www.finance-ni.gov.uk/publications/ni-house-price-index-statistical-reports>

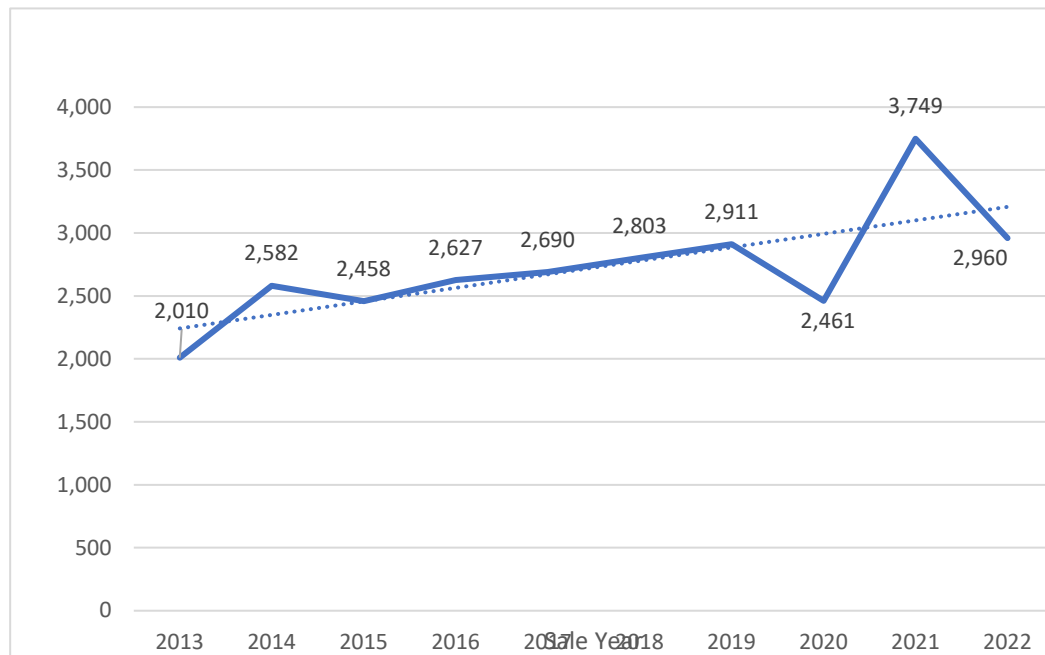


Figure 5: Ards and North Down Number Of Verified House Sales (Source: NI House Price Index detailed statistics Quarter 2 2023)

11.18 The 2016 HGI would therefore not appear to be locally applicable to the Borough in terms of facilitating the current trend of housing supply. Moreover, as the HGI is policy neutral, this scenario does not consider local factors such as the need to attract and house a workforce to support continued employment growth or meeting the affordable housing need within the Borough.

Demographic trend-led (SNPP-2018)

11.19 The HGI figure for the Borough – as considered above – was based on the 2016 NISRA household projection alongside data on vacant housing stock, second homes and net stock loss (conversions/closures/demolitions).

11.20 Edge Analytics²⁶ was commissioned by the Council to develop a demographic scenario to estimate total dwelling requirements for the Borough based upon the updated 2018 NISRA population projections²⁷, using historical data up to the 2018 base year. The household and dwelling growth implications of the scenario were estimated through the application of household membership rates, average household size, communal population statistics and a dwelling vacancy rate. These assumptions were sourced from the 2011 Census and the

²⁶ Edge Analytics provide expert services in demographic and housing evidence, forecasting and modelling. Its technology has been used by NISRA to derive its 2012- and 2014-based LGD population and household projections.

²⁷ The scenario replicates the NISRA 2018-based SNPP, using historical population evidence up to its 2018 base year. (see Technical Supplement 2A (Appendix A) Ards and North Down Data Inputs & Assumptions, 2023)

2016-based household projection model from NISRA²⁸.

- 11.21 This scenario shows a lower level of population growth is estimated to occur over the plan period than that projected previously, with population growth slowing at the end of the plan period before starting to decline in the final year – largely due to declining natural change²⁹. The trend of an aging population continues and accelerates in the second half of the plan period. Therefore, projected household creation under this scenario totals 4,602 with a total projected new dwelling requirement of 4,883 over the plan period.
- 11.22 Similar to the HGI scenario considered at (a) above, the current build rates sit at odds with a projected new dwelling requirement of 4,883. In review of past build rates sourced from Building Control and the Council's internal Housing Monitor, for April 2017 to March 2022, 2,959 dwelling units were recorded as completed. This equates to 61% of the total projected new dwelling requirement under this scenario being built out to date – i.e. the fifth year of the plan period. Therefore, similar conclusions may be drawn to those above. Namely, that a reliance on demographic-led trends to set the housing requirement for the Borough would not facilitate the current trend of housing supply.
- 11.23 Moreover, as the demographic trend is policy neutral, this scenario does not consider local factors such as the need to attract and house a workforce to support aspirations for continued employment growth or meeting the affordable housing need within the Borough.

Dwelling-led (past build rates)

- 11.24 In Ards and North Down, the total record of completions between 2005-2022 was 10,648 dwelling units which equates to an average of 626 dwellings per annum. As Table 12 shows, if this average is then extrapolated out to account for the remainder of the Plan period to 2032, it equates to a total of 9,219 units for the 15 years.

²⁸ See Technical Supplement 2A (Appendix A) Ards and North Down Data Inputs & Assumptions (2023)

²⁹ 'Natural change' is the excess of births over deaths

Table 12: Housing Completions by Financial Year April 2005 – March 2032

	Financial Year (Apr - Mar)	New Dwelling Completions
Building Control new dwelling completions	2005-06	934
	2006-07	1074
	2007-08	761
	2008-09	660
	2009-10	629
	2010-11	534
	2011-12	502
	2012-13	461
	2013-14	454
	2014-15	523
	2015-16	459
	2016-17	698
Housing Monitor Data	2017-18*	672
	2018-19*	672
	2019-20	616
	2020-21	543
	2021-22	456
Average build rate of 638 units per annum (2005-2022) projected for remaining years of plan period	2022-23	626
	2023-24	626
	2024-25	626
	2025-26	626
	2026-27	626
	2027-28	626
	2028-29	626
	2029-30	626
	2030-31	626
	2031-32	626
Total for 2017 - 2032		9,219

*average figure as 2018 is a baseline year for housing monitoring resumption in the Borough.

11.25 Analysis of past build rates is based on a factual representation of what has occurred historically. Depending on the time frame examined, there may be a sensitivity to events such as global economic downturns following the housing market crash, the COVID-19 pandemic, or the war in Ukraine for example.

11.26 The historic and current build rates provide useful information in relation to monitoring the supply and availability of housing units and land in the Borough. This can assist in considering the applicability of the various scenarios to local circumstances and how best the plan should consider the management and, where appropriate, the release of future housing land. However, as this scenario is based upon the replication of past trends rather than a consideration of the growth aspirations and future housing needs of the Borough, it is not considered sound to rely solely on it to justify the housing requirement over the Plan period.

Employment-led

- 11.27 There is an inter-reliance between employment growth, population growth, and housing growth. Aspirations for employment growth through job creation are normally realised through population growth in the working-age cohort of 16-64, alongside accompanying growth in related cohorts. This, in turn, should be aligned with housing growth to ensure that sufficient land is allocated to meet the housing needs of the population and support the planned employment growth over the plan period. Conversely, lack of employment opportunity will stymie in-migration to the Borough in the working-age cohort. It is likely that this would exacerbate population decline and an increasingly aging population with accompanying decreases in the working age profile and that of children aged 16 and under.
- 11.28 The Council's ambition as set out in the Integrated Strategy for Tourism, Regeneration and Economic Development 2018-2030³⁰ (ITRDS) sets out a "success scenario" of 7,500 new employee jobs by 2030. As the ITRDS covers a 12-year period between 2018 and 2030, this equates to an annual job creation figure of 625. Extrapolating this annual job creation figure of 625 over the 15-year plan period gives a total of 9,375 jobs.
- 11.29 The ITRDS also makes reference to a 'high growth' scenario, identified by the NI Skills Barometer forecast, with the creation of c. 4000 jobs over the strategy period of 2018-2030.
- 11.30 Supplementary analysis to the Employment Land Review³¹ modelled that the forecast job creation can be achieved through identifiable development projects and their indirect impacts. It also provided high-level commentary on the potential sources of labour to fill the projected jobs, including in-migration, retention of local talent and a reduction in levels of out-migration.
- 11.31 Modelling³² and projections based upon the SNPP-2018 NISRA data indicate an aging population and an accompanying decline both in children and in the working age cohort of 16-64. Thus, leading to a declining labour force over the plan period. Therefore, given the long-term projection of an increasingly negative natural change component, the Borough

³⁰ <https://www.ardsandnorthdown.gov.uk/article/1687/Integrated-Strategy-for-Tourism-Regeneration-and-Economic-Development>

³¹ See Technical Supplement 5D Employment Land Review Supplementary Analysis (Jettora, 2025)

³² See Technical Supplement 2A (Appendix A) Ards and North Down Data Inputs & Assumptions (Edge Analytics, 2023)

needs to attract its labour force through in-migration, a trend that is already being observed and is projected to continue through to the end of the plan period.

- 11.32 Further demographic analysis and modelling³³ was carried out to take account of the two employment scenarios set out in the ITRDS. This modelled the population growth required to support an increase in the labour force projected to fill the job creation targets for the Borough for both the ‘success’ and ‘high growth scenarios’.
- 11.33 The modelling showed that achievement of the ‘high growth’ scenario would necessitate a population increase of 17,871 which equates to 10,173 households. This gives a total new dwelling requirement of 10,795 over the plan period or 720 dwellings per annum.
- 11.34 The modelling concluded that to achieve the Council’s ‘success’ scenario of 9,375 jobs by 2032 would necessitate a population increase of 25,318 which equates to 13,372 households. This gives a total new dwelling requirement of 14,189 over the Plan period (or an average of 946 dwellings per annum).

Table 13: Demographic outputs based on employment-led scenarios for housing growth³⁴

Scenario	Change 2017 - 2032				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings	Employment
Employment-led (Success)	25,318	15.8%	13,372	20.2%	1,790	946	473
Employment-led (High Growth)	17,871	11.2%	10,173	15.4%	1,325	720	295

Flexibility Margin

- 11.35 The inclusion of a margin of flexibility above a new dwelling requirement figure is an approach used in other jurisdictions including Scotland and Wales.
- 11.36 In Wales, the Local Development Plan Manual (2020) requires the inclusion of a flexibility margin. Paragraph 5.59 states:

³³ See Technical Supplement 2A (Appendix A) Ards and North Down Data Inputs & Assumptions (Edge Analytics, 2023)

³⁴ See Technical Supplement 2A Ards and North Down Demographic Scenario Output (Edge Analytics, 2023)

It will be extremely rare that all sites identified in a plan will come forward in the timescale anticipated. Whilst there is a need to improve certainty through frontloading, as described earlier in the Manual, there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites. A development plan will not be effective if it cannot accommodate changing circumstances. This means that a flexibility allowance must be embedded into the plan. The plan will need to evidence there is sufficient flexibility above the requirement to account for non-delivery and unforeseen issues... The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced. The policy framework in the plan should be clear regarding the housing requirement, provision, and flexibility allowance. The level of flexibility chosen by the LPA when the plan goes on deposit is broadly maintained upon adoption of the plan.

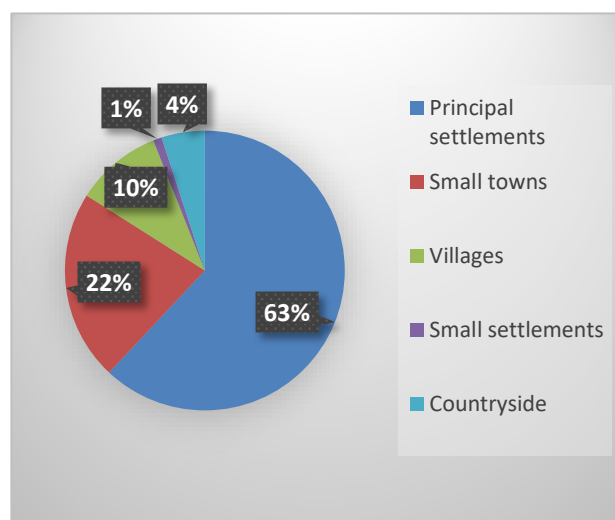
- 11.37 Locally, the application of a 10% flexibility margin was proposed by Lisburn and Castlereagh City Council and subsequently found sound through Independent Examination (IE) by the Planning Appeals Commission (PAC).
- 11.38 The application of a 10% flexibility margin is considered prudent given the extent of the commitments within the Borough which comprise the majority of the new dwelling requirement to meet the employment aspirations of the Council. Applying a 10% flexibility allowance to the employment-led housing growth option of 14,189 results in a total housing requirement of 15,608 dwelling units.

Allocation of Housing to Settlement Tiers and the Countryside

- 11.39 The Council seeks to manage housing growth to achieve sustainable patterns of residential development across the Borough. In line with the spatial framework and guidance contained within the RDS and the Spatial Growth Strategy of the LDP, the strategic housing allocation will direct the majority of housing to the principal settlements of Bangor and Newtownards to support population and employment growth. The allocation to the smaller towns Comber, Donaghadee, Holywood and Portaferry consolidates their role and function as local centres for housing, employment and services, whilst sustaining and maintaining the villages and smaller settlements. The allocation to the open countryside is in line with the aim of facilitating sustainable rural development of an appropriate scale.

Table 14 and Figure 6 Strategic Housing Allocation to Settlement Tiers and Countryside

Tier	Allocation to tier (%)
Principal settlements	63
Small towns	22
Villages	10
Small settlements	1
Countryside ³⁵	4
Total	100%



Allocation of Housing between Settlements in each Tier

11.40 The LDP is tasked in the SPPS to employ the Housing Evaluation Framework (HEF) as one element to consider in the allocation of housing to specific locations. The HEF comprises a number of tests to be employed to determine which settlements are most sustainable and suitable for absorbing new development.

Table 15 Housing Evaluation Framework (Source: RDS 2035)

Resource Test	Studies should be carried out to assess and detail the existence of community assets and physical infrastructure such as water, waste and sewage, including spare capacity.
Environmental Capacity Test	An assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made.
Transport Test	Studies should be carried out to assess the potential for integrating land use and public transport and walking and cycling routes to help reduce reliance on the car.

³⁵ Countryside allocation is generally taken to be the average build rate, currently 36 dwellings p/a or 535 over the 15-year plan period.

Economic Development Test	The potential to facilitate an appropriate housing and jobs balance and to unlock any major strategic development opportunities should be assessed and detailed.
Urban and Rural Character Test	Assessment should be made of the potential to maintain a sense of place, and to integrate new development in a way that does not detract from the character and identity of the settlement.
Community Services Test	The potential to underpin and, where necessary, reinforce the community service role and function of the settlement should be assessed and detailed.

- 1.7 Each settlement was qualitatively assessed before comparison with other settlements in the same tier of the settlement hierarchy. This informed a planning judgement on the appropriate allocation of housing among settlements in each tier of the settlement hierarchy, bearing in mind other guidance, such as RDS directions. The ranking of settlements in each tier can be seen in table 16.

Table 16: HEF ranking of Settlements within tiers

Settlement Tier	Rank (HEF)	Settlement
Principal Settlements	1	Bangor
	2	Newtownards
Small Towns	1	Comber
	2	Donaghadee
	3	Holywood
	3	Portaferry
Villages	1	Portavogie
	2	Millisle
	3	Kircubbin
	4	Ballygowan
	5	Ballyhalbert
	5	Carrowdore
	6	Crawfordsburn
	6	Cloughey
	7	Ballywalter
	8	Lisbane
	9	Greyabbey

	9	Seahill
	10	Helen's Bay
	10	Groomsport
	11	Killinchy
	12	Balloo

Existing Housing Commitments

- 11.41 The SPPS tasks Councils to take account of dwellings already constructed, approvals not yet commenced and residential development proposals likely to be approved.
- 11.42 Results from the Housing Land Availability Study for 2021-2022³⁶ show that there is remaining potential for a total of **7,855** units. This includes potential for 5,557 units on sites currently zoned for housing, and a further 2,298 units from live planning approvals on unzoned sites or 'windfall'.
- 11.43 Due to the lapse in housing monitoring until it was recommenced in 2018, the Council was unable to rely on this data to accurately calculate the number of dwellings constructed since the start of the Plan period. Therefore, the Council has used averages for completions for the monitoring periods April 2017 to March 2018 and April 2018 to March 2019 of 672 units. When added to the figures for housing completions from the subsequent monitoring periods of 2019-2020 (616 units), 2020-2021 (543 units), and 2021-2022 (456 units), the LDP team has calculated that **2,959** units have been constructed since the start of the plan period in April 2017 until the end of the monitoring period in March 2022.
- 11.44 The allocation was adjusted to account for completions since the start of the Plan period in April 2017 to March 2022³⁷. Due to the variable nature of the HM data, it was not possible to attribute completions to distinct settlements. Therefore, the total completions have been deducted from the total housing requirement prior to its distribution amongst settlements and the countryside.
- 11.45 This residual figure will form the basis for the allocation to each settlement and the countryside over the Plan period.
- 11.46 A collective allocation has been given for the villages; this is intended to retain a degree of flexibility to allow for the most sustainable approach to determining development limits and housing potential areas at LPP stage. Small settlements and the countryside also receive a collective allocation.

³⁶The monitoring period with results most recently available at the time the draft Plan Strategy was presented to Elected Members for agreement. All Housing Land Availability Reports are available for viewing on the Council website.

³⁷ The last monitoring period before presentation of the housing allocation to Elected Members for agreement.

Table 17: Allocation³⁸ of Housing between Settlements

Settlement Tier and % allocation	Settlement	Housing Allocation 2017-2032³⁹
Principal Settlements 62%	Bangor	4,508
	Newtownards	3,381
Small Towns 22%	Comber	1,193
	Donaghadee	795
	Holywood	398
	Portaferry	398
Villages 10%		1,265
Small Settlements 1%		176
Countryside 4%		535
Total		12,649

³⁸ This is an indicative strategic allocation for settlements. More detailed analysis will take place at Local Policies Plan stage including a review of existing zonings, urban capacity sites, and an up-to-date assessment of infrastructure capacity, in particular relating to wastewater treatment works upgrades and network capacity. This may require some adjustments be made to the allocation.

³⁹ Total housing requirement adjusted to deduct completions from the start of the plan period (Apr 2017) to the end of the monitoring period Mar 2022 giving 2,959 units. The nature of this data meant it was not possible to break down to an individual settlement level so it has been taken off the total of 15,608 to give a residual allocation of 12,649.

Table 18: Potential Sources of Housing Supply across settlement tiers and settlements

Settlement Tier	Settlement	Potential Housing Supply (Units)			
		Existing commitments ⁴⁰	Urban Capacity potential ⁴¹	Windfall allowance ⁴²	Potential Housing Supply
Principal Settlements	Bangor	1072	412	520	2,004
	Newtownards	3,323	486	520	4,329
Small Towns	Comber	1,068	85	190	1,343
	Donaghadee	522	34	150	706
	Holywood	210	23	120	353
	Portaferry	176	75	70	321
Villages		1,076	- ⁴³	690	1,766
Small Settlements		106	-	130	236
Countryside		302	-	-	302
Total		7,855	1,115	2,390	11,360 ⁴⁴

⁴⁰ Housing commitments include zoned housing sites and sites with live planning approval.

⁴¹ Total includes urban capacity and development opportunity sites.

⁴² Based on historic windfall completions between 2000-2016 (Source: NILUD), extrapolated to cover 10-year time period from 2022 – 2032 to avoid double counting with total completions 2017-2022.

⁴³ Guidance in the RDS and PPS 12 sets out that settlements with population greater than 5000 are a logical threshold above which to apply an urban capacity study. There is potential within the villages of the Borough for an additional 207 units but this does not form part of the overall potential and is provided in the Urban Capacity Study for information only.

⁴⁴ The figure for dwellings already constructed (2,959) is not included in this total as it has already been deducted from the overall requirement of 15,608 to give a total housing allocation of 12,649 as per Table 17.

Urban Capacity Study

- 11.47 The SPPS states that housing allocations should be informed by urban capacity studies that assess the potential for future housing growth within the urban footprint⁴⁵ and the capacity for different types and densities of housing (see Technical Supplement 2B).
- 11.48 The Urban Capacity Study concluded that the identified sites could yield approximately 1,115 dwelling units. A breakdown per settlement is shown in Table 17. The Council's Urban Capacity Study is intended to be updated in due course as part of the evidence base for the Local Policies Plan.

Windfall

- 11.49 The SPPS recognises that windfall potential (i.e. an estimate of potential housing sites that were neither zoned nor anticipated during the formulation of the LDP, but which become available during the lifetime of the plan) is a key source of housing supply over the Plan period.
- 11.50 As set out in paragraph 8.17, the Urban Capacity Study incorporates a windfall assessment. The windfall allowance for the Borough is estimated to be 2,390 dwelling units. A breakdown per settlement is shown in Table 17 alongside other sources of potential housing supply including existing commitments and the urban capacity potential.

Total Potential Housing Supply

- 11.51 Including 2,959 dwellings constructed from the start of the Plan period (Apr 2017-Mar 2022) to the sources of potential housing supply above gives a total potential housing supply of 14,319 dwellings.

Management of Housing Land Release

- 11.52 As evidenced, the Borough has extensive residential commitments which, together with dwellings already constructed, sites identified through the Urban Capacity Study and an allowance for windfall, make up the majority of the strategic housing requirement for the Borough.
- 11.53 A phased policy approach allows the Council to promote the most sustainable

⁴⁵ The urban footprint is defined as the continuous built-up area of the settlement. The boundary will be represented by an uninterrupted line, often lying inside the planned settlement limit. The urban footprint contains land which has a formal urban use including land on the edge of the settlement where it forms part of the curtilage of a building. However, this does not necessarily imply that gardens are acceptable for housing development. Undeveloped zoned land at the edge of the settlement will be excluded.

locations for housing development within existing urban areas first, whilst allowing flexibility to respond to changing circumstances over the Plan period and maintain an ongoing supply of housing land to meet housing need.

- 11.54 The draft Plan Strategy approach as set out in the Growth Strategy will therefore treat more sustainable sites as Phase 1 housing land - comprising existing commitments⁴⁶ and housing zonings within the urban footprint.
- 11.55 Phase 2 housing land would be identified and zoned at Local Policies Plan stage to be held in reserve, comprising of sites outside the urban footprint that are retained legacy housing zonings without live planning permission for housing and any new zonings where required. The intention is that applications for housing on Phase 2 lands would be refused unless one of two exceptional circumstances were met:
- a) monitoring indicates that there is a need to release Phase 2 sites in order to maintain a 5-year supply of available housing land; or
 - b) the release of a particular site is required to meet an extreme and localised particular housing need.

In the case of criterion b) it is envisaged that proposals would be supported by NIHE and demonstrate that all other alternative forms of provision have been exhausted.

Operational Housing Policies

Urban Housing

HOU 1 Housing Development in Settlements

- 11.56 The operational policy largely derives from extant policy in PPS 7. It is elevated in line with the Council's intention to champion a design-led approach to new residential development.

HOU 2 Design of New Residential Development

- 11.57 The policy derives from extant policy in PPS 7 that was deemed to be working well in consultation with DM colleagues. It is updated to reflect the Council's priorities throughout the draft Plan Strategy including referencing active travel policy requirements and measures to reduce likely energy consumption and the use of decentralised, renewable and low or zero-carbon energy supply. The policy also incorporates elements from the addendum to PPS 7 in respect of established residential areas.

⁴⁶ existing commitments may include some residential approvals on zoned housing land that is outside the urban footprint.

HOU 3 Affordable Housing

- 11.58 The approach has evolved from the POP due to further engagement with key consultees in NIHE alongside a consideration of the Borough's evidence base in respect of its affordable housing need, its high level of existing commitments and likely potential sources of supply through analysis of urban capacity sites. This led to the threshold of 5 housing units or more engaging the policy which requires at least 20% of housing provision be affordable. Engagement with Elected Members has shaped the language of the policy in respect of the viability and practicability of on-site provision. Discussion with DM colleagues has been crucial in terms of the practical application of the policy. The Council intends to produce SPG to provide further guidance on this policy and is committed to engaging with best practice and discussion facilitated by the Department for Communities (DfC) in respect of its Housing Supply Strategy and remit for affordable housing.

HOU 4 Accessible and Adaptable Homes

- 11.59 The policy approach has evolved from the POP which had a well supported option that the LDP would seek a proportion of Lifetime Homes in new developments. Further research, consultation with cross-Council colleagues in Building Control and engagement with DM colleagues has led to the draft policy requiring that all residential development follow certain criteria in respect of accessibility and adaptability. This was felt to represent a pragmatic approach as it will provide choice within new housing stock to meet a range of needs whilst allowing people to stay in their own homes for longer in future thus reducing the need for costly adaptations at a later stage or having to leave home due to lack of suitability. However, stopping short of the full Lifetime Homes standards was considered reasonable as many fall outside the remit of Planning to determine or enforce. The policy as drafted also requires 10% of all new dwellings in developments of 20 or more dwellings be to wheelchair accessible standards.

HOU 5 Traveller Accommodation

- 11.60 Despite there not being a current need for accommodation for the Traveller community within the Borough, it was deemed reasonable and flexible to include the policy for the Plan period.

HOU 6 Residential Extensions and Alterations

- 11.61 This policy is largely accepted by DM colleagues to be working well and therefore is largely the same as extant policy contained within the addendum to PPS 7. Colleagues were keen to retain the guidance in the annex for assessing applications and this has been replicated along with the light test in Annex D of the draft Plan Strategy.

HOU 7 Protected Housing Areas within Town Centres

- 11.62 The policy approach of extant plans has been retained to allow for the protection of these established housing areas. They provide valuable housing stock in accessible locations and add to a sense of vitality in centres.

HOU 8 Houses of Multiple Occupation

- 11.63 Although there is not an identified issue with Houses of Multiple Occupation (HMOs) in the Borough, the policy approach is important due to ongoing issues of affordability which could lead to a rise in HMOs over time. They can play an important role in providing low-cost housing solutions but controls are necessary to ensure the accommodation is of a suitable standard and that the environmental quality and/or character of an area does not suffer due to a proliferation of this form of accommodation.

Rural Housing

HOU 9 New Dwellings in Existing Clusters

- 11.64 The draft policy approach is largely as per the extant policy in PPS 21 which in large part was found to be working well, albeit there are some instances whereby a cumulative effect of approvals under the clustering policy was found to be eroding rural character. The policy clarifies that the buildings and focal points in the cluster must be outwith any settlement development limits and either benefit from planning permission, a CLEUD⁴⁷ or be permitted development as per the legislation to satisfy the policy.

HOU 10 Replacement Dwellings

- 11.65 The draft policy approach is largely as per the extant policy in PPS 21 which in large part was found to be working well. The policy specifies that in instances where the existing curtilage is restricted, there should be consideration of an extension to the existing curtilage before an off-site location. There is also some clarification included as to the essential characteristics of a dwelling and around proposals which display obvious rebuilding and repairs without the benefit of a CLEUD.

HOU 11 Conversion and Reuse of Existing Buildings

- 11.66 The draft policy approach reflects the change in policy from PPS 21 afforded by the introduction of the requirement that buildings should be locally important in the SPPS. The policy gives examples of how an applicant might demonstrate local importance and also emphasises that a suitably qualified professional should provide evidence that the building is structurally capable of conversion.

⁴⁷ Certificate of Lawfulness of Existing Use or Development.

HOU 12 Affordable Housing in the Countryside

- 11.67 The draft policy approach is largely as per the extant policy in PPS 21 which in large part was found to invoked rarely in the Borough. However in consultation with NIHE it has been retained to address instances of rising and unforeseen affordable housing need in the rural area.

HOU 13 Personal and Domestic Circumstances

- 11.68 The draft policy approach is largely as per the extant policy in PPS 21 which although exceptionally engaged, largely was found to be working well in consultation with DM colleagues.

HOU 14 Dwellings for Non-Agricultural Business Enterprises

- 11.69 The draft policy approach is largely as per the extant policy in PPS 21 which largely was found to be working well in consultation with DM colleagues.

HOU 15 Ribbon Development

- 11.70 As set out in paragraph 10.14, there was a strong consensus amongst DM colleagues that rural character was being eroded in the Borough due to the approval of infill dwellings as exceptions to the extant policy on ribboning in CTY 8. There was agreement that the original intent of the policy was not to create a situation where rural character was being undermined, but to allow for exceptional opportunities for a dwelling (or two) in circumstances where rural character had already been eroded to such a degree that additional dwellings would not result in any harm. The draft policy approach therefore strengthens the policy by changing the definition of a substantial and built up frontage to include five or more buildings excluding smaller and ancillary buildings such as garages, sheds, outbuildings and open sided structures. In this vein, the policy as drafted reduces the exceptional opportunity for infilling a small gap from two dwellings within a gap site to one dwelling.

HOU 16 Residential Caravans and Mobile Homes

- 11.71 The draft policy approach is largely as per the extant policy in PPS 21 which largely was found to be working well in consultation with DM colleagues.

HOU 17 Dwellings on Farms

- 11.72 The draft policy approach is largely as per the extant policy in PPS 21 which largely was found to be working well in consultation with DM colleagues. There is some clarification included from learning from appeals and case law including that farm

businesses without an established group of farm buildings will not satisfy the policy, nor will a dwelling sited to visually link or cluster with a dwelling and ancillary domestic buildings or neighbouring farm buildings. Some additional clarification has been included in relation to the definition of an active farmer.

12.0 SOUNDNESS

- 12.1 The LDP has been prepared to meet the tests of soundness as set out in the DfI Development Plan Practice Note 6: Soundness (Version 2, May 2017). The draft Plan Strategy insofar as it relates to the housing allocation, strategic housing policies and operational housing policies and other relevant policies in the document are regarded as sound, as it is considered to have met the various tests of soundness as summarised in Table 19.

Table 19: Consideration of Soundness

Procedural Tests	
P2	The housing allocation, strategic housing policies and operational housing policies have evolved from the POP, POP consultation Report and Consultee, Development Management and Councillor Engagement as described in earlier sections of this document.
P3	The housing allocation, strategic housing policies and operational housing policies have been subject to Sustainability Appraisal. Further details are included in the Sustainability Appraisal Report.
Consistency Tests	
C1	The housing allocation, strategic housing policies and operational housing policies have taken account of the RDS in particular RG 6, RG 7, RG 8 and the Spatial Framework.
C2	The housing allocation, strategic housing policies and operational housing policies have taken account of all five outcomes of our Community Plan which are considered relevant to housing.
C3	The housing allocation, strategic housing policies and operational housing policies have taken account of existing planning policies as contained within the SPPS, in particular paragraphs 6.133-6.147.
C4	The housing allocation, strategic housing policies and operational housing policies have taken account of the existing development plans within Ards and North Down, ongoing Council initiatives and the neighbouring council context.

Coherence and Effectiveness Tests

CE1	The housing allocation, strategic housing policies and operational housing policies have taken account of the emerging LDP's of our three neighbouring councils, and are not considered to be in conflict with them.
CE2	The housing allocation, strategic housing policies and operational housing policies are founded on a robust evidence base which includes the evidence base referenced in this document, the POP and responses to it and subsequent consultation with consultees, including Dfl.
CE3	The monitoring framework within the draft Plan Strategy sets out the detail of how housing will be monitored.
CE4	Housing policies will be reviewed at Plan Review stage. Where possible, the need for flexibility has been considered in the strategic approach and draft policies. There will be flexibility to review existing zonings and the need for new zonings and key site requirements considered further at Local Policies Plan stage.