

Local Development Plan, draft Plan Strategy (DPS) Consultation - Survey

Instructions

- Write as **clearly** as you can— these forms might be scanned
- Write your answers in the same language as this form

Formal Consultation period

The Statutory Consultation period opens on 17 October 2025 and closes at 4.30pm on 15th December 2025

Responses to be returned to the LDP team at

2 Church Street , Newtownards BT23 4AP

or by email to planning@ardsandnorthdown.gov.uk

Respondents should note that any representations should be made in full to the Council. Further information or clarification will not be sought unless requested by an independent examiner.

Soundness

A key feature of the local development plan system is 'soundness' which requires the development plan document to be tested in terms of content, conformity and the process by which it is produced, at independent examination (IE).

The tests of soundness are based upon three categories which relate to how the development plan document (DPD) has been produced, the alignment of the DPD with central government regional plans, policy and guidance, and the coherence, consistency and effectiveness of the content of the DPD.

More information on Soundness is available : [Development Plan Practice Note 6 Soundness](#) .

Tests of Soundness

The tests of 'Soundness' for Development Plan documents are as follows:

Procedural tests

P1 - Has the DPD been prepared in accordance with the Council's timetable and the Statement of Community Involvement?

P2 - Has the Council prepared its Preferred Options Paper and taken into account any representations made?

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

P4 - Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?

Consistency tests

C1 - Did the Council take account of the Regional Development Strategy?

C2 - Did the Council take account of its Community Plan?

C3 - Did the Council take account of policy and guidance issued by the Department?

C4 - Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining council's district?

Coherence and effectiveness tests

CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils.

CE2 - The Strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.

CE3 - There are clear mechanisms for implementation and monitoring.

CE4 - It is reasonably flexible to enable it to deal with changing circumstances.

1. **Name:**

David Donaldson

2. **Address**

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HOLLYWOOD

3. **Post Code** (optional)

BT18 9AE

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5. **Phone Number** (optional)

07920873600

6. **Are you responding as an individual?** (optional)

**Choose exactly 1 option*

No

7. **Are you responding on behalf of an organisation?** (optional)

**Choose exactly 1 option*

NO

8. **Organisation and Job Title (if applicable):** (optional)

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9. Are you an Agent responding on behalf of a client? (optional)

**Choose exactly 1 option*

YES

10. Client Name , address (if applicable): (optional)

MR AND MRS PEARSON

C/O DONALDSON PLANNING LTD

11. Do you wish to upload a document to add to your survey response? (optional)

Please note the maximum size of files that can be uploaded is 50MB

This field cannot be completed on paper. Please use the online version of this form instead.

YES – SEE ATTACHED SUBMISSION DD13

12. Please indicate how you would like your representation to be dealt with at Independent Examination (please select one item only): Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.

Further information on the IE procedures can be found at <https://www.pacni.gov.uk/node/443>

**Choose exactly 1 option*

X Oral Hearing (Choose this procedure to present your representation orally at the public hearing) Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only.

13. Soundness of the Plan (optional)

Do you believe the draft Plan Strategy is sound?

**Choose exactly 1 option*

X No

14. If you believe the strategy is unsound, please indicate which tests of soundness it fails and provide your reasoning below. (optional)

CE1 AND CE2

15. Procedural Tests - (optional)

P1 Has the DPD been prepared in accordance with the Council's timetable and the Statement of Community Involvement?

**Choose exactly 1 option*

X Yes

16. Test P1 Comments (optional)

N/A

17. P2 Has the Council prepared its Preferred Options Paper and taken into account any representations made? (optional)

**Choose exactly 1 option*

X Yes

18. Test P2 Comments (optional)

N/A

19. P3 Has the DPD been subject to Sustainability Appraisal including Strategic Environmental Appraisal? (optional)

**Choose exactly 1 option*

X Yes

20. Test P3 Comments (optional)

N/A

21. P4 Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD (optional)

**Choose exactly 1 option*

X Yes

22. Test P4 Comments (optional)

N/A

23. Consistency Tests (optional)

C1 Did the Council take account of the Regional Development Strategy?

**Choose exactly 1 option*

X

Yes

24. Test C1 Comments (optional)

N/A

25. C2 Did the Council take account of its Community Plan? (optional)

**Choose exactly 1 option*

X Yes

26. Test C2 Comments (optional)

N/A

27. C3 Did the Council take account of policy and guidance issued by the Department?
(optional)

**Choose exactly 1 option*

X Yes

28. Test C3 Comments (optional)

N/A

29. C4 Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or any adjoining council's district? (optional)

**Choose exactly 1 option*

X Yes

30. Test C4 Comments (optional)

N/A

31. Coherence and Effectiveness Tests (optional)

CE 1 The DPD sets out coherent strategy, from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of

neighbouring councils?

**Choose exactly 1 option*

X No

32. Test CE 1 Comments (optional)

33. CE 2 The Strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

(optional)

**Choose exactly 1 option*

No

34. Test CE 2 Comments (optional)

SEE WRITTEN SUBMISSION

35. CE 3 There are clear mechanisms for implementation and monitoring? (optional)

**Choose exactly 1 option*

No

36. Test CE 3 Comments (optional)

37. CE 4 It is reasonably flexible to enable it to deal with changing circumstances? (optional)

**Choose exactly 1 option*

No

38. Test CE 4 Comments (optional)

SEE WRITTEN SUBMISSION

39. If you consider the draft Plan Strategy to be unsound please provide details of changes you suggest to make the draft Plan Strategy sound. (optional)

SEE WRITTEN SUBMISSION

40. Do you have any comments on the Implementation and Monitoring of the draft Plan Strategy? (optional)

41. Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) (optional)

Do you have any comments?

N/A

42. draft Habitats Regulations Assessment(HRA) (optional)

Do you have any comments on the draft HRA?

N/A

43. Equality Impact Screening Report (optional)

Do you have any comments on the EQ screening?

N/A

44. Rural Needs Impact Assessment (optional)

Do you have any comments on the RNIA?

N/A

45. Please add any additional comments (optional)

N/A

What Happens Next?

Thank you for your representation to the Local Development Plan draft Plan Strategy (dPS).

You will receive a formal acknowledgement letter from the Council's Planning Department . We will issue this within 5 working days of your response.

This is in addition to the acknowledgement auto-generated by the Go Vocal system.

Representations received during the public consultation stages of the Plan Strategy and Local Policies Plan, must be made available for public inspection, both in hard copy, and on the Council's website, as required by Legislation.

Representations will also be shared with an Independent Examiner such as the Planning Appeals Commission and the Department for Infrastructure as part of the Local Development Plan Examination Process.

OUR REF: DD13

SUBMISSION TO DRAFT PLAN STRATEGY ON BEHALF OF MR AND MRS PEARSON

SUBJECT: SPATIAL GROWTH STRATEGY AND HOLLYWOOD

1.0 INTRODUCTION


- 1.1 This submission to the Draft Plan Strategy (DPS) relates primarily to the Strategic Housing Allocation and in particular to the allocation to Hollywood.
- 1.2 Mr and Mrs Pearson own land at Church Road which is suitable for development and should be designated for housing at Local Policies Stage:



- 1.3 This submission explains why the DPS, as currently drafted, is **unsound under the coherence and effectiveness tests CE1, CE2 and CE4** in that it does not make sufficient housing provision for Hollywood to achieve the Plan Objectives or the aspirations set out in the Growth Strategy.

2.0 PLAN OBJECTIVES

- 2.1 The Plan Objectives include the following:

**Spatial and Cross-cutting Objectives**

Promote sustainable growth in the right places and at the appropriate level, to meet the needs of all those who live, work, visit and invest in the Borough.

A Healthy and Safe Place

- 1.123 By 2032, healthy and safe sustainable communities have been created with a mix of housing types and tenures in suitable locations – including accessible and affordable homes. Communities offer a good range of community facilities with access to jobs, key services and infrastructure, thereby reducing the need to travel. Opportunities are realised to promote the active participation of residents of all age groups in physical and cultural activity and to enjoy good health and wellbeing.



Social Objectives

To provide a sufficient supply of land for new housing to support the Council's growth ambition and facilitate delivery to meet diverse housing needs up to 2032.

- 2.2 Plainly, the DPS must include policies and allocations which will deliver upon these worthwhile objectives.

3.0 SPATIAL GROWTH STRATEGY

SGS 1: Spatial Growth Strategy

- Focus growth in Bangor and Newtownards as the principal settlements of the Borough, strengthening their roles as the primary locations for future housing and economic growth and investment in the Borough;
- Consolidate and strengthen the role of Holywood as befitting its position within the BMA and reflecting its potential to support a growing digital and creative industry within the Borough;
- Consolidate the role and function of the small towns of Comber and Donaghadee as local service centres for housing, employment, facilities and services to support the local population and their rural hinterlands;
- Consolidate Portaferry as a new small town within the settlement hierarchy to reinforce its role and function as an important local centre for housing, employment, facilities and other services serving the rural hinterland of the Ards Peninsula;
- Sustain and maintain the diversity and quality of our villages by encouraging local development which supports the population and services of local communities; and
- Sustain and maintain our rural communities in small settlements and the countryside by facilitating sustainable development of an appropriate scale and character that affords protection to rural character and our rich natural environment.

- 3.1 The SGS is considered to be generally consistent with the RDS.
- 3.2 The two largest settlements are identified as the primary locations for future housing and economic growth. That is sound.
- 3.3 The proposal to '**consolidate and strengthen**' Holywood as befitting its position within the BMA is welcomed, as is its potential to support a growing digital and creative

industry. **However the Strategy is 'unsound' under CE2** in that that neither the employment land allocation (SGS3) nor the housing allocation (SGS5) for Holywood are consistent with its stated role under the SGS.

SGS 2: Settlement Hierarchy

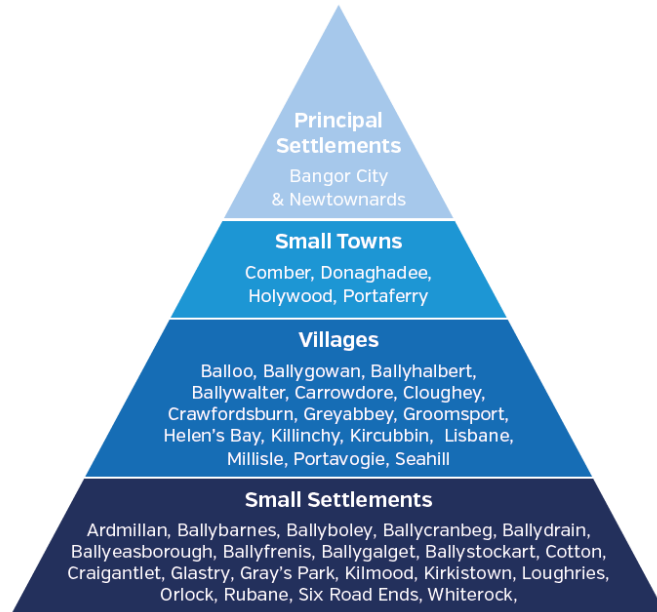


Figure 3: Settlement Hierarchy

- 3.4 The 'small towns' range in population from about 2,372 persons (Portaferry) to 10,757 persons (Holywood).
- 3.5 According to the NISRA 2021 Census (Table 8 of Appendix 3 in Technical Supplement 1) Holywood is categorised as a '**Band D medium town**' in terms of its population.
- 3.6 Holywood clearly has a size, status and range of facilities which is significantly more extensive than the other small towns. In addition, SGS1 identifies it separately from the other towns because of its place within the BMA.
- 3.7 The Strategy is **unsound** as it fails to include Holywood as a 'medium town' in the Hierarchy.

SGS 3: Strategic Allocation of Economic and Industrial Development Land

- Allocate a minimum of 25 hectares of land for economic development purposes, focussed upon the principal settlements and most accessible locations;
- Support and promote Strategic Employment Locations as the preferred employment locations in the Borough;
- Support and promote zoned employment sites throughout the Borough to provide opportunities for a range of economic needs and businesses including business startups and Small to Medium Enterprises (SMEs);
- Provide a spatial framework for the application of economic development policies, intended to deliver sustainable and environmentally sensitive economic growth across the Borough, including rural areas; and
- Monitor the uptake of employment lands to ensure that the LDP maintains a 5-year supply.

- 3.8 The allocation of a **minimum of 25 ha** for economic and industrial development, focused upon the principal settlement, is **sound**.
- 3.9 The proposal to introduce Strategic Employment Locations is also sound, and in this respect it is interesting that it has identified Balloo Industrial Estate in Bangor and Jubilee Road, Newtownards at this Plan Strategy stage. The Strategy should not rule out the identification of a further SEL at Local Policies stage, especially as it is noted from Table 3 that Jubilee Rd has only 3.61 ha remaining undeveloped.
- 3.10 It is noted in para 2.34 that the employment land allocation has considered a 'baseline' scenario of 4,500 jobs, and a 'success scenario' of 7,500 jobs. The latter has resulted in a need for 20.5 ha of employment land. This has been 'rounded up' to 25 ha.
- 3.11 **However, despite the specific SGS aspirations for Holywood, the DPS has failed to identify any existing or potential employment land locations within the town. In this respect it fails the CE2 test and must be regarded as unsound.**

SGS 4: Strategic Housing Allocation

- Allocate 15,608 new homes to meet housing need and support job creation over the Plan period;
- Manage housing growth to achieve sustainable patterns of residential development across the Borough [see SGS 5: Strategic Housing Allocation across settlements]; and
- Management of the release of housing land to ensure the LDP maintains a 5-year supply throughout the Plan period [see SGS 6].

- 3.12 The DPS notes that the housing allocation was informed by the SPPS, including HGIs, allowance for commitments; urban capacity studies etc.
- 3.13 The Strategic allocation is founded upon an employment led approach. This is consistent with the Council's Integrated Tourism, Regeneration and Economic Development Strategy produced in 2018. Whilst this has resulted in a figure which

exceeds the HGI figures for the Borough, it must be considered soundly based, as the ambition to achieve employment growth within the Borough is an entirely legitimate objective.

The allocation of 15,608 homes up to 2032 is supported.

Allocation to Settlement Tiers

- 3.14 Table 4 indicates that 61% of the housing allocation will be to Bangor and Newtownards. The four small towns will collectively receive 22% of the allocation; the villages will receive 10% and the small settlements 1%.
- 3.15 Whilst the RDS Evaluation Framework is exhibited in Table 5, the 'scoring' of settlements within each tier is not evident from the DPS, with paragraph 2.52 noting only that 'planning judgement' was applied to the appropriate allocation of housing among settlements.

SGS 5: Strategic Housing Allocation across settlements

Table 6:
Strategic Housing Allocation across settlements⁸

	Potential Housing Supply (units)				
	Housing Allocation 2017-2032	Existing Commitments	Urban Capacity Potential	Windfall Allowance	Total Potential Housing Supply
Bangor	4,508	1,072	412	520	2,004
Newtownards	3,381	3,323	486	520	4,329
Comber	1,193	1,068	85	190	1,343
Donaghadee	795	522	34	150	706
Hollywood	398	210	23	120	353
Portaferry	398	176	75	70	321
Villages	1,265	1,076	-	690	1,766
Small Settlements	176	106	-	130	236
Countryside	535	302	-	-	302
Total	12,649	7,855	1,115	2,390	11,360

- 3.16 it is evident that Bangor and Newtownards have the largest allocations, with 4,508 and 3,381 houses respectively.
- 3.17 There are two striking anomalies in the allocations at small town level. These relate to Hollywood and Portaferry.

- 3.18 **Holywood** has a population equivalent to about 6.5% of the Borough. Portaferry has only 1.4% of the population. Holywood is also recognised in the Evaluation Framework as having an extensive range of facilities and excellent transport links.

Qualitative Analysis	
Strengths	<ul style="list-style-type: none"> • Good transport links to Belfast and Bangor (rail and bus). • Range of services and facilities available. • Good quality housing areas. • Health centre available. • Nursery, primary and secondary education facilities. • Convenience and comparison-shopping facilities. • Community facilities available (community hall, active resident's association). • Public realm works completed. • Coastal Area has high amenity value. • Designated Conservation Area.
Weaknesses	<ul style="list-style-type: none"> • Holywood bypass is a protected route. • Settlement is bounded environmental designations which may impact on possible expansion of the settlement.
Opportunities	<ul style="list-style-type: none"> • Good links to Belfast. • Regeneration opportunities available. • Capacity at WWTW.
Constraints	<ul style="list-style-type: none"> • Some areas susceptible to surface water flooding. • Environmental designations abutting the settlement limits may be a constraint to further expansion.

Conclusion / Key findings:

The population size and range of services and facilities that are provided within the settlement limit including the presence of a health centre and education facilities indicates that Holywood occupies a level of services and infrastructure that places it within Level 2 of the Hierarchy of Settlements and Related Infrastructure Wheel. Based on these findings it is recommended that Holywood should be designated as a **Town** in the new settlement hierarchy.

- 3.19 The rationale for an allocation of only 398 units to Holywood (ie the same as Portaferry) is simply not explained or evident within the DPS or the Technical Supplements, especially as the comments contained in the Evaluation Framework in Technical Supplement 1 are highly favourable.
- 3.20 Failure to be transparent in the allocation process has previously been flagged by the PAC, in relation to the Ard s and Down Area Plan, where the Report of the Examination commented as follows;

2.12.24 In our opinion, the most unsatisfactory feature of DOE's housing distribution process is the lack of transparency in translating settlement scores into housing numbers. Appendices 2.2A and 2.2B to the technical supplement show a total score of 19 for both Newtownards and Donaghadee, yet 2,800 houses were allocated to the former and only 750 to the latter. Comber, with a score of 18, was allocated 500 more houses than Donaghadee. Downpatrick had the same score as Ballynahinch but was allocated 1,000 more houses. The heading to Column (2) of Appendices 2.2A and 2.2B confirms that the allocations were derived not only from the settlement scores but from other factors. It is not made clear, however, how much influence the other factors had or whether they were confined to the considerations discussed in the text under Table 14B.

3.21 The DPS could be subject to the same criticism. On a pro-rata allocation according to population, which is the least that Hollywood might expect, it should receive a housing allocation of around **820 units**.

3.22 The allocation of only 398 units for Hollywood is **unsound** and irrational.

Housing Supply

3.23 Allied to the concern over the wholly inadequate allocation to Hollywood is the fact that Table 6 indicates that the potential housing supply for the town equates to 353 units. This is comprised of 210 commitments; 23 urban capacity; and 120 windfall units.

3.24 A more detailed assessment of housing supply for Hollywood demonstrates that the 'potential supply' figure in the DPS is unrealistic.

Donaldson Planning has carried out an assessment of potential supply for Hollywood, updated to November 2025 (**Appendix 1**). This calculates the potential supply to be:

Existing commitments on Remaining Zoned land (draft BMAP)	12
Other existing commitments (ie approved but not yet built)	75
Urban Capacity	0
Windfall	120
TOTAL	207

3.25 The above analysis demonstrates the stark reality that the DPS will constrain population and economic growth in Hollywood unless amended. It is unsound as it is clearly contrary to the Strategy's objective to promote sustainable growth and consolidate and strengthen the town's role.

3.26 Furthermore, the analysis demonstrates the high reliance upon apartment developments to meet housing needs (approximately 60% of the commitments).

3.27 And none of the committed developments are indicated as being for social or affordable accommodation, despite Table 4 of TS2 (below) indicating a need for 193 social houses between 2023 and 2028:

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
Hollywood	Hollywood	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

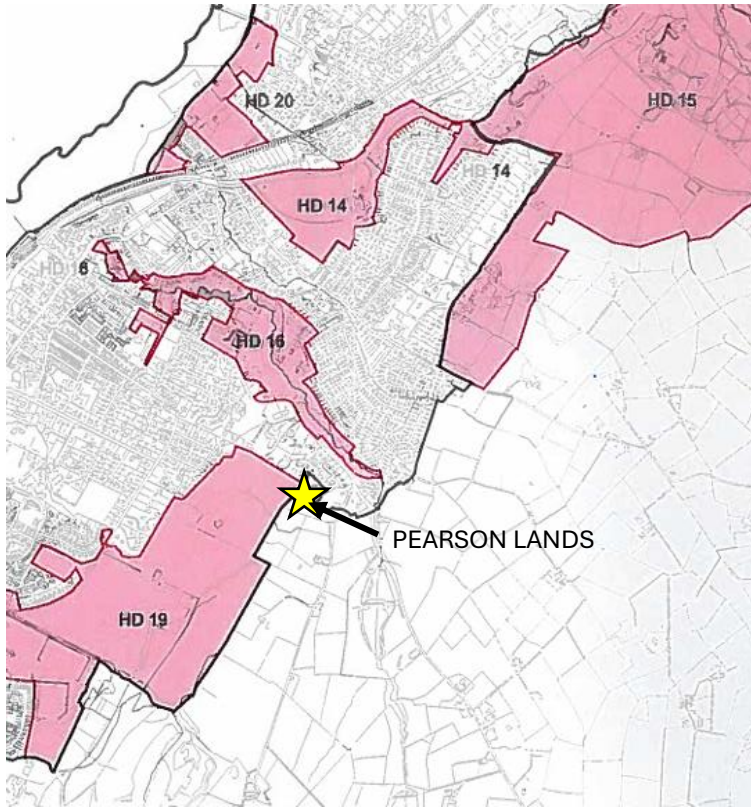
- 3.28 It is clear that the housing supply is likely to be nearly 200 houses short of the Council's own allocation, and **some 600 houses short** of an allocation which would be consistent with its population share. The allocation should be amended to:

HOLYWOOD APPROPRIATE ALLOCATION	COMMITTED SUPPLY AND URBAN CAPACITY	REQUIREMENT
820	207	613

- 3.29 **The Spatial Growth Strategy is unsound under CE2 in that the strategy and allocations are neither realistic nor appropriate for Hollywood, nor are they founded on a robust evidence base. In addition, under CE4 there is no apparent flexibility to deal with changing circumstances.**

4.0 COUNTRYSIDE STRATEGY

- 4.1 It is noted that the Draft Plan Strategy proposes to retain the LLPA and Areas of High Scenic Value which were defined in draft BMAP, until a review at Local Policies Stage.
- 4.2 The identification of LLPAs and AHSVs are important to protect the setting of settlements.
- 4.3 The existing Draft BMAP LLPAs around Hollywood are indicated below. The Pearson lands are not within the LLPA:



draft BMAP LPAs.

- 4.4 The Pearson lands which would be suitable for development represent a 'notch' in the draft BMAP development limit, immediately to the west of The Spires. With development approved and under construction in the adjacent former quarry this site represents a logical and sustainable location to meet some of Hollywood's housing needs:



5.0 Conclusions

5.1 The overall housing allocation to the Borough is regarded as sound.

5.2 However in the context of Holywood the Draft Plan Strategy must be regarded as **unsound** under the coherence and effectiveness tests CE1, CE2 and CE4. As currently proposed, its housing allocation is contrary to the strategic plan objectives and will fail to strengthen the role of this medium sized town.

5.3 **The Plan Strategy should be amended so that Holywood is defined as a 'medium town' in the hierarchy and allocated a much larger share of housing.**

DONALDSONPLANNING LTD

February 2026

APPENDIX 1 HOLYWOOD HOUSING SUPPLY ANALYSIS

TABLE 1: DEVELOPMENT POTENTIAL ON ZONED SITES (DRAFT BMAP)

PLAN REF	LOCATION	STATUS
HD02/01	KINNEGAR CLOSE	BUILT<2003
HD02/02	ALTONA MANOR	BUILT<2003
HD02/03	BELFAST ROAD	BUILT<2003
HD02/04	PRIORY PARK	BUILT<2003
HD02/05	CHURCH ROAD	BUILT<2003
HD02/06	DEMESNE ROAD	BUILT<2003
HD02/07	BANGOR ROAD	BUILT<2003
HD03/01	SHORE ROAD	BUILT
HD03/02	58 KINNEGAR DRIVE	BUILT
HD04/01	ABBAY RING	BUILT
HD04/02	CROFT ROAD	BUILT
HD04/03	STATION ROAD	UNDER CONSTRUCTION c.12 HOUSES TO BE COMPLETED
HD05/01	DEMESNE MANOR	BUILT
HD06/01	ABBAY RING (SOCIAL)	BUILT
TOTAL REMAINING POTENTIAL ON ZONED LAND		12 HOUSES

TABLE 2: DEVELOPMENT POTENTIAL ON SITES (> 1 UNIT) APPROVED BUT NOT YET DEVELOPED (ie COMMITTED) @NOVEMBER 2025

PLANNING REF	LOCATION	STATUS/POTENTIAL
LA06/2017/1040/F	BALLYMENOCH ROAD	7 HOUSES
LA06/2017/1139/RM	22 OLD CULTRA ROAD	3 HOUSES
LA06/2018/1328/F	WOODLANDS BANGOR ROAD	11 HOUSES AND 16 APARTMENTS
LA06/2020/0708/F	136 AND 138 BANGOR ROAD	3 HOUSES
LA06/2020/0865/F	10-20 DOWNSHIRE ROAD	21 APARTMENTS (U/C)
LA06/2021/0413/F	STATION ROAD	4 APARTMENTS
LA06/2023/1984/F	KING HOUSE HIGH STREET	5 APARTMENTS
LA06/2024/0677/F	163 CHURCH ROAD	5 HOUSES
TOTAL POTENTIAL (COMMITTED)		29 HOUSES AND 46 APARTMENTS

TABLE 3: URBAN CAPACITY STUDY - SITES IDENTIFIED BY COUNCIL IN TECHNICAL SUPPLEMENT 2B

LOCATION	AREA/YIELD	COMMENT
160 HIGH STREET	1.5/18	THIS SITE IS SITE NOW ALMOST COMPLETE WITH 16 HOUSES AND 13 APARTMENTS
KINNEGAR BARRACKS	N/A	UNKNOWN IF WILL BECOME AVAILABLE OR WHEN.
154 CHURCH ROAD	0.7/5	FARM BUILDINGS – ENTIRELY SPECULATIVE IF WILL BECOME AVAILABLE FOR DEVELOPMENT
TOTAL	2.2/23	0