

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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BT18 9AE

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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)

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 MCCUTCHEON

C/O DONALDSON PLANNING

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 DD05

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*

NO

22. Test P4 Comments (optional)

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)

SEE WRITTEN SUBMISSION

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)

See written submission

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 ATTACHED DOCUMENT DD05

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.

REF:DD05

ARDS AND NORTH DOWN LOCAL DEVELOPMENT PLAN

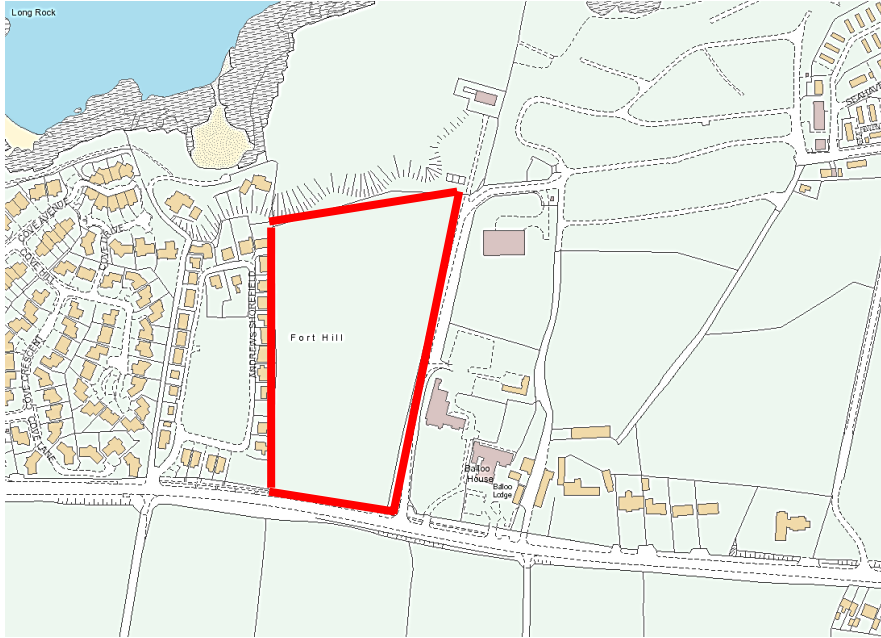
**RESPONSE TO DRAFT PLAN STRATEGY ON BEHALF OF
MR McCUTCHEON**

SUBJECT: SPATIAL GROWTH STRATEGY AND GROOMSPORT

DECEMBER 2025

1.0 INTRODUCTION


- 1.1 This response is to the Draft Plan Strategy (DPS) published in September 2025.
- 1.2 The representation is on behalf of Mr McCutcheon, who owns lands at Donaghadee Road, Groomsport. A site location plan, showing the lands contained within the context of the village, is below:



- 1.2 As can be seen, the lands are well enclosed, with substantial development to both west and east along Donaghadee Road.
- 1.3 This submission sets out the reasons why the approach proposed in relation to villages such as Groomsport is unsound, and why the Plan Strategy must provide a specific housing allocation for Groomsport.

2.0 DRAFT STRATEGY OBJECTIVES

- 2.1 The DPS sets out a number of objectives which are intended to guide its proposals. Some of these are below:

 **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 A key consideration of 'soundness' is whether the growth strategy and the associated policies are likely to deliver upon these objectives.

3.0 SPATIAL GROWTH STRATEGY

- 3.1 The Spatial Growth Strategy (SGS) is at the heart of the Plan Strategy. SGS1 is replicated below:

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.

- 3.2 The SGS is considered to be generally consistent with the RDS.
- 3.3 The two largest settlements are identified as the primary locations for future housing and economic growth.
- 3.4 In relation to the 'villages' the SGS comment that it will '**sustain and maintain**' the diversity and quality of villages by encouraging local development which supports the population and local communities is appropriate. Paragraph 2.12 refers to '*appropriately scaled*' residential development. However there is no indication of what '*appropriately scaled*' development might constitute, and indeed the SGS5 housing allocation would suggest that such development may be limited.

- 3.5 There is no reference to maintaining a balance across villages, whereby additional potential for development might be attributed to those settlements which are currently deficient in terms of housing supply.
- 3.6 The proposed settlement hierarchy is set out in SGS2.

SGS 2: Settlement Hierarchy

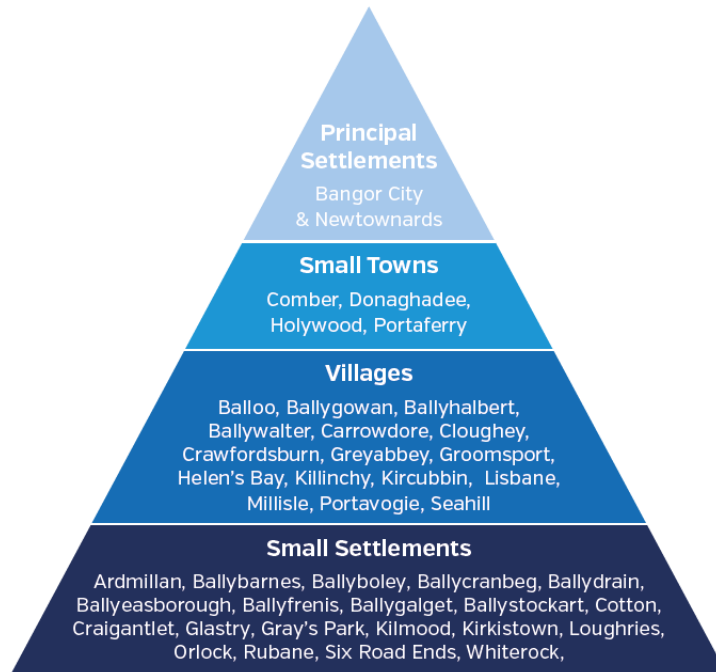


Figure 3: Settlement Hierarchy

- 3.7 The position of Bangor and Newtownards at the top of the hierarchy is clearly logical, as is the inclusion of Groomsport as one of 16 settlements in the village tier.
- 3.8 SGS4 sets out the strategic housing allocation:

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].

- 3.9 The DPS notes that the housing allocation was informed by the SPPS, including HGIs, allowance for commitments; urban capacity studies etc.
- 3.10 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 and facilitate 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

- 3.11 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%.
- 3.12 Whilst the RDS Evaluation Framework is exhibited in Table 5, the 'scoring' of settlements within each tier is not evident from the DPS. Paragraph 2.52 notes only that 'planning judgement' was applied to the appropriate allocation of housing among settlements.
- 3.13 Furthermore, there is no 'breakdown' whatsoever between the villages, with these all aggregated into a single allocation of 1,265 dwellings.

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
Holywood	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

- 3.14 Whilst the allocation to the villages is 1,265 dwellings the 'potential supply' is noted as 1,766. On this basis the Strategy would suggest that the allocation of additional housing lands at this level of the hierarchy is not envisaged. This 'collective' approach is unsound, for the following reasons.

3.15 **First**, there is a significant imbalance between the size and function of settlements at the village tier. For example Balloo has less than 200 population, whereas Groomspart has in excess of 1,000. Groomspart has also been identified in Technical Supplement 1 as having significant strengths, not least the availability of capacity in the waste water treatment works:

Qualitative Analysis	
Strengths	<ul style="list-style-type: none"> • Good transport links to Belfast. • Close to services and facilities Bangor. • Good quality housing areas. • Benefits from some local shopping facilities. • Community facilities available (play parks, active resident's association). • Areas of open space. • Area of Village Character. • Car parking available.
Weaknesses	<ul style="list-style-type: none"> • No doctors/ healthcare facilities, education facilities, post primary schools, library. • Limited employment opportunities.
Opportunities	<ul style="list-style-type: none"> • Good links to Belfast via Bangor. • Capacity at WWTW. • Harbour area.
Constraints	<ul style="list-style-type: none"> • Environmental designations located to the north and east of the settlement which may impact on the potential expansion of the settlement.

3.16 **Second**, there is massive divergence between those settlements which retain significant housing potential and those which do not. This creates an imbalance across the Plan area which is inconsistent with the objective to support the local population and meet diverse housing needs.

3.17 The Land Availability Table for 2023 - 2024 (Table 2 ANDBC Land Availability Report 2024) shows that settlements in the outer Ards Peninsula (eg Ballyhalbert Carrowdore, Cloughey, Millisle, Portaferry and Portavogie) all have significant potential, whereas Groomspart is recorded as having **only 9 houses**.

Villages					
Baloo	0	0	6	0.08%	0.37
Ballygowan	4	0.13	91	1.27%	3.06
Ballyhalbert	0	0	242	3.37%	12.02
Ballywalter	3	0.02	37	0.52%	1.05
Carrowdore	14	0.75	119	1.66%	4.88
Cloughey	1	0.13	51	0.71%	2.2
Crawfordsburn	0	0	9	0.13%	2.01
Grevabbey	1	0.09	10	0.14%	1.09
Groomspport	0	0	9	0.13%	0.19
Helen's Bay	2	0.13	7	0.10%	0.58
Killinchy	0	0	2	0.03%	0.32
Kircubbin	0	0	24	0.33%	0.46
Millisle	4	0.08	185	2.58%	8.35
Portaferry	5	0.19	158	2.20%	7.73
Portavogie	8	0.36	169	2.35%	8.53

3.18 **Third**, Technical Supplement 2b Table 15 illustrates the complete absence of urban capacity yield with Groomspport:

Table 15: Summary of Results for Villages

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

3.19 **Fourth**, Groomspport is one of the settlements set out in Table 4 of Technical Supplement which has been identified as having a social housing requirement, in this case for **36 units**.

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

- 3.20 Given that there can be no policy requirement for social housing on committed sites, the only way to meet local needs will be to zone additional land. This could be entirely for social/affordable housing or it could be for a mixture of affordable and private. To meet a need for 36 units is likely to require the allocation of approximately 2 hectares of land.
- 3.21 And finally, if a housing allocation was to be fairly based upon population share, then Groomsport should have an allocation in the order of **130 units**. The DPS is unsound as it offers no allocation whatsoever.
- 3.22 Overall, there is little point in carrying out settlement evaluation exercises if the Plan Strategy approach is simply to treat all the villages in the same way, and not consider their individual requirements in terms of available housing supply and choice, future needs, etc.

4.0 CONCLUSIONS

- 4.1 Overall, the Strategy is unsound under the CE2 test in relation to Groomsport. It fails to provide policies or allocations which are realistic and appropriate.
- 4.2 Whilst Groomsport is acknowledged as a village with an attractive setting, the Plan Strategy must be amended to allow for some modest growth for the settlement. The lands at Donaghadee Road can accommodate this, without any adverse effects in terms of urban sprawl, or coalescence with other settlements.

APPENDIX 1 – HOUSING LAND AVAILABILITY IN GROOMSPORT



It can be seen from the above Housing Land Availability Map that the large Cove Bay development (16748) has been completed, and that virtually all of the monitor sites are now historic. In short, the housing needs for Groomsport, and in particular social housing needs, will not be met unless the Strategy sets out an allocation for the settlement.