

## 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](mailto: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

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**2. Address**

50a HIGH STREET

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HOLLYWOOD

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**3. Post Code (optional)**

BT18 9AE

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**4. Email (optional)**

david@donaldsonplanning.com

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**5. Phone Number (optional)**

07920873600

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**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)**

MCCARTAN FAMILY C/O DONALDSON PLANNING

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**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 DD03 SUBMISSION**

**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

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**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

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**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

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**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

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**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)

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**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

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**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

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**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

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**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

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**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*

No

**32. Test CE 1 Comments** (optional)

See written submisison

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**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

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

*\*Choose exactly 1 option*

No

**36. Test CE 3 Comments** (optional)

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**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

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**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 DD03

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

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

Do you have any comments?

N/A

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

Do you have any comments on the draft HRA?

N/A

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**43. Equality Impact Screening Report** (optional)

Do you have any comments on the EQ screening?

N/A

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**44. Rural Needs Impact Assessment** (optional)

Do you have any comments on the RNIA?

N/A

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**45. Please add any additional comments** (optional)

N/A

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## **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:DD03**

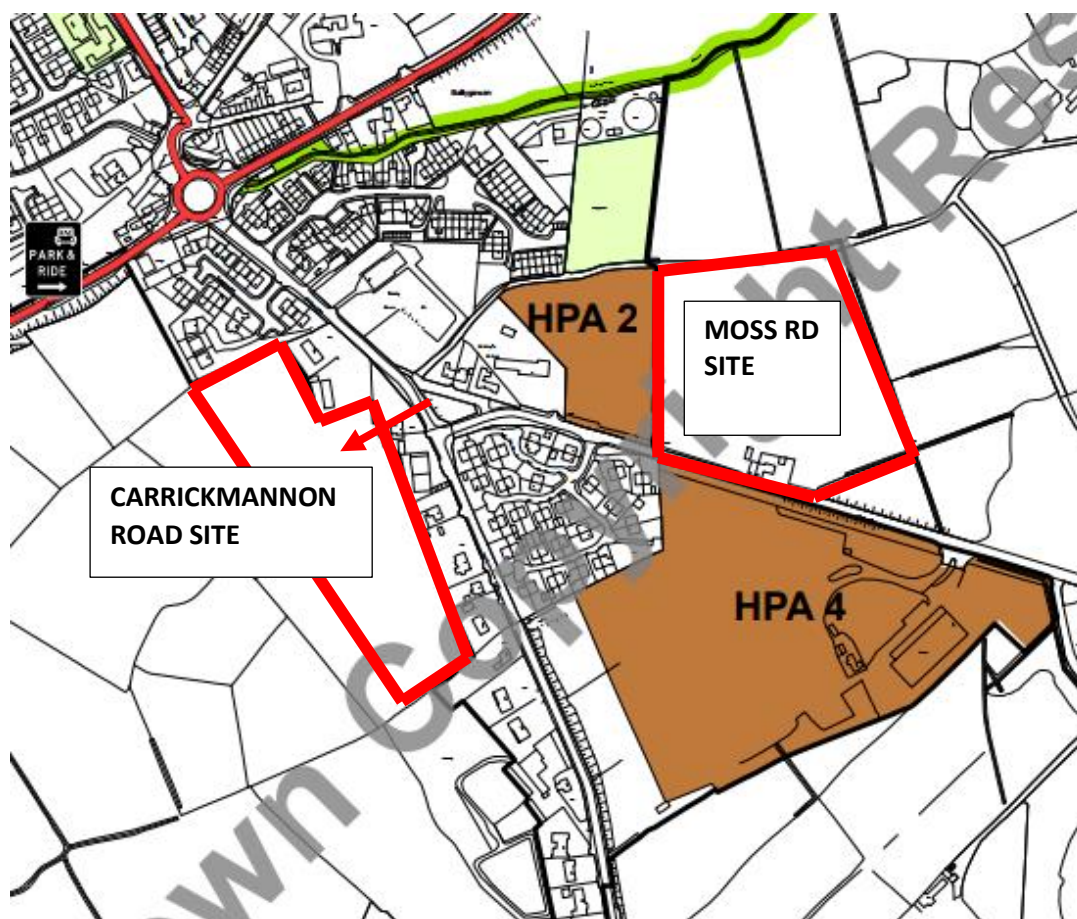
**RESPONSE TO ARDS AND NORTH DOWN DEVELOPMENT PLAN  
STRATEGY**

**SUBJECT: SPATIAL GROWTH STRATEGY AND BALLYGOWAN**

**DECEMBER 2025**

## 1.0 INTRODUCTION

- 1.1 This response to the Draft Plan Strategy relates to Ballygowan. **It sets out the reasons why the DPS is unsound in relation to Ballygowan, and in particular to its status within the settlement hierarchy and its lack of a specific housing allocation for the Plan period.**
- 1.2 The submission is on behalf of the owners of two parcels of land at Moss Road and Carrickmannon Road, Ballygowan. Site location plans are below:



- 1.3 The areas shown above are both suitable for development. However as drafted, the Plan Strategy fails to provide any certainty as to what quantum of land will be allocated to meet local needs in Ballygowan over the Plan period.

## 2.0 PLAN OBJECTIVES

- 2.1 The Plan Objectives include a range of aspirations. Particularly important are the objectives to meet the needs of all of those who live, work and invest in the Borough. The provision of a mix of housing types and tenures, and meeting of diverse housing needs are clearly stated. Plainly, a Strategy which will not deliver upon these objectives will be unsound under the Coherence and Effectiveness tests (CE1 – CE4).

### 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 SGS is sound in the comment that it will '**sustain and maintain**' the diversity and quality of villages by encouraging local development which supports the population and local communities. Paragraph 2.12 refers to '*appropriately scaled*' residential development. 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. There is no reference towards maintaining any balance across villages, whereby additional potential for development might be attributed to those which are currently deficient in terms of housing supply.

**SGS 2 SETTLEMENT HIERARCHY**

3.4 The proposed settlement hierarchy is set out in SGS2.

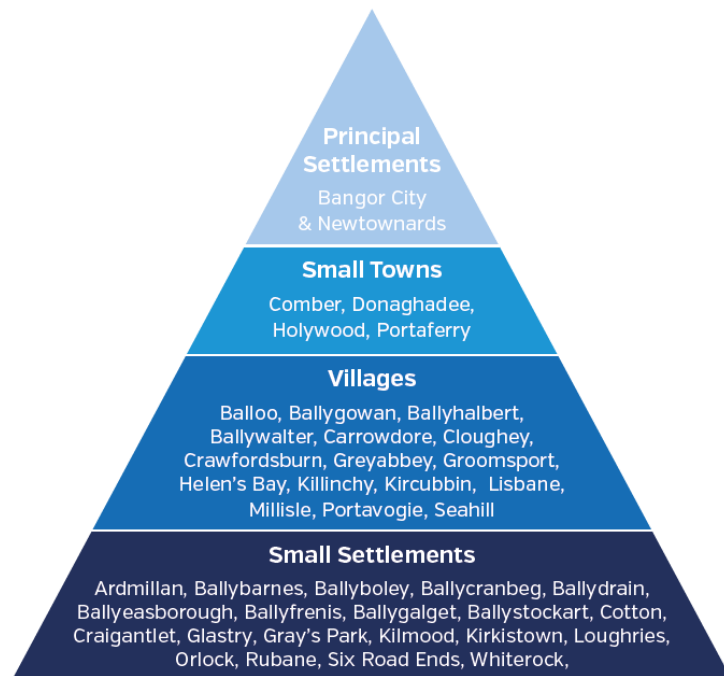
**SGS 2: Settlement Hierarchy**

Figure 3: Settlement Hierarchy

- 3.5 The position of Bangor and Newtownards at the top of the hierarchy is logical.
- 3.6 The identification of Portaferry (population 2,372) as one of four 'small towns' is noted.
- 3.7 **However the hierarchy is unsound under CE2. It is neither realistic nor appropriate, nor is it founded on a robust evidence base. The failure to identify Ballygowan as a small town is unsound for the following reasons:**
- i) Ballygowan had a 2021 population of over 3,000 persons, or 1.9% of the Borough.
  - ii) It falls within the recognised NISRA 'Band F – Intermediate Settlement', of over 2500 persons and not 'Band G – villages of 1000-2500'.
  - iii) The settlement has a range of services and facilities which are significantly greater than many of the other villages, as set out in Technical Supplement 1; and
  - iv) Unlike many of the villages (particularly those in the outer Ards Peninsula) the settlement has excellent transport links to other locations and has proven to be an attractive and sustainable location for family housing.
- 3.8 Technical Supplement 1 provides more detailed evaluations of the various settlements, including Ballygowan. Comments are set against the RDS evaluation framework. The summary position for Ballygowan is as follows;

Qualitative Analysis	
Strengths	<ul style="list-style-type: none"> <li>• Good transport links to Belfast.</li> <li>• Close to services and facilities at Comber.</li> <li>• Good quality housing areas.</li> <li>• Benefits from local shopping facilities.</li> <li>• Community facilities available (community hall, play parks, active residents association).</li> </ul>
Weaknesses	<ul style="list-style-type: none"> <li>• No doctors/ healthcare facilities, post primary schools, library etc.</li> <li>• Limited employment opportunities.</li> <li>• Limited car parking.</li> </ul>
Opportunities	<ul style="list-style-type: none"> <li>• Good links to Belfast.</li> <li>• Available sites zoned for housing.</li> <li>• Park and Ride scheme (land designated in extant development plan).</li> </ul>
Constraints	<ul style="list-style-type: none"> <li>• No capacity at WWTW at present.</li> <li>• Some areas susceptible to flooding.</li> <li>• Quarry located to the south-east of the settlement limit.</li> </ul>

- 3.9 It is concerning that the evaluations appear to have been carried out in 2020, and so a number of elements are now outdated.
- 3.10 In particular the reference to '**no capacity**' in the WWTW for Ballygowan is simply wrong. Not only was the WWTW upgraded in 2021, but the NI Water information indicates that it now has capacity for a population of **around 4500 persons**.
- 3.11 Given the sewerage constraints in other locations across the Borough, the availability of capacity within the Ballygowan WWTW to accommodate growth must be regarded as a major strength rather than a constraint.
- 3.12 The fact that Ballygowan has excellent transport links, a primary school and other local facilities also point to its suitability for appropriate growth.
- 3.13 Ballygowan clearly has the population base, connectivity, infrastructure and other attributes necessary for it to be identified as a 'small town' within the hierarchy, and with a consequential housing allocation.

## SGS 4 AND SGS5 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).

- 3.14 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.

### Allocation to Settlement Tiers

- 3.15 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%.
- 3.16 Whilst the RDS Evaluation Framework is exhibited in Table 5, the 'scoring' of settlements within each tier is not evident from the PS, with paragraph 2.52 noting only that 'planning judgement' was applied to the appropriate allocation of housing among settlements. Furthermore, there is no 'breakdown' whatsoever between the villages, with these all aggregated into a single allocation:

## SGS 5: Strategic Housing Allocation across settlements

**Table 6:**  
Strategic Housing Allocation across settlements<sup>8</sup>

	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
<b>Total</b>	<b>12,649</b>	<b>7,855</b>	<b>1,115</b>	<b>2,390</b>	<b>11,360</b>

- 3.17 The allocation to the villages is 1,265 dwellings. However 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 several reasons.
- 3.18 **First**, there is a significant imbalance between the size and function of settlements at the village tier. For example Ballygowan has over 3000 population, whereas Balloo has less than 200 persons.
- 3.19 **Second**, there is also an imbalance between those settlements which retain significant housing potential (mainly located in the Outer Ards Peninsula) and those which do not has created an imbalance across the Plan area which is inconsistent with the objective to meet diverse housing needs.
- 3.20 For example, as the Land Availability Table for 2023 - 2024 (Table 2 ANDBC Land Availability Report 2024) below shows, Ballyhalbert Carrowdore, Cloughey, Millisle, Portaferry and Portavogie all have potential which is significantly higher than Ballygowan:

Villages					
Balloo	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
Greyabbey	1	0.09	10	0.14%	1.09
Groomsport	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

- 3.21 **Third**, on the basis of population alone Ballygowan would be expected to have a small town allocation of around **240 units**. The fact that it does not have any specific allocation at all is **unsound**.
- 3.22 **Fourth**, Technical Supplement 2b Table 15 illustrates the total absence of urban capacity yield with Ballygowan:

**Table 15: Summary of Results for Villages**

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

3.23 **Fifth**, Ballygowan is one of the settlements set out in Table 4 of Technical Supplement 2 which has been identified as having a social housing requirement, in this case for 15 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
Hollywood	Hollywood	193
Comber	Comber	163
Donaghadee	Donaghadee	60
Groomspoint	Groomspoint	36
Ballygowan	Ballygowan	15
Portaferry	Portaferry	20
Ballywalter	Ballywalter	15
Crawfordsburn	Crawfordsburn	14
Killinchy	Killinchy	10
Millisle	Millisle	15
Remaining Settlements (need <10) <sup>13</sup>		40
<b>Total</b>	<b>Ards and North Down</b>	<b>1,390</b>

3.24 Given that there is no ability to deliver 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.

3.25 **Finally**, whilst the 2023-2024 Land Availability Table indicates potential for 91 units in Ballygowan, this is largely dependent upon the delivery of two sites. As our assessment (Appendix 1) shows, one of these, at Prospect Road has planning permission but is not yet started. The other is land which is owned by the Church and which has not been

made available for development throughout the entire period since publication of the Ards and Down Area Plan.

## 4.0 LOCATIONAL CONSIDERATIONS

4.1 It can clearly be seen that both parcels of land relate well to existing development and the urban form. The lands at Moss Road are essentially a notch in the urban form, with development zoned or underway to the west and south. Importantly, apart from small areas on the site margins, these lands are not within an area which is subject to flooding, as confirmed by the Strategic Flood Map extract below:



DFI Rivers - Strategic Flood Map

4.2 The urbanised context of the lands at Moss Road is evident from the streetview image below:



4.3 The land to the west of Carrickmannon Road sits at a higher level behind a row of frontage development. It can be accessed via improvements to the existing Moss Road junction, most likely with a mini-roundabout facility. Development can be kept off the higher slopes of the drumlin, so that it will be well contained within the urban fabric.

4.4 Both parcels of land benefit from good access and connectivity to the facilities in the centre of the village. Unlike other areas on the margins of the settlement, they are

within easy walking distance of a full range of facilities, including shops, community facilities and public transport.

- 4.5 The lands at Moss Road extend to about 3.5ha (8 acres) and the Carrickmannon lands extend to about 2 ha (5 acres). So they will be capable of accommodating in the region of 130 houses and will therefore contribute towards housing needs and modest growth in Ballygowan.

## 5.0 CONCLUSIONS

- 5.1 Overall, the Strategy fails to provide policies or allocations which are realistic and appropriate in relation to Ballygowan. The evidence base shows that Ballygowan is the largest in the 'village' tier by some margin, and that in terms of both population and NISRA categorisation it should be regarded as a 'small town', with its own specific housing allocation.
- 5.2 **The Draft Strategy is unsound. There is little logic in carrying out a settlement evaluation exercise when the Plan Strategy approach will treat all the villages in the same way, effectively curtail growth in appropriate locations, and fail to meet their individual requirements in terms of housing supply and choice, future needs, etc.**

DONALDSONPLANNING LTD

December 2025