

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:**

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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)

HILMARK HOMES LTD

19 CHURCH ROAD

PORTADOWN

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 DD02

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)

Consistency Tests (optional)

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

**Choose exactly 1 option*

Yes

23. Test C1 Comments (optional)

N/A

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

**Choose exactly 1 option*

Yes

25. Test C2 Comments (optional)

N/A

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

**Choose exactly 1 option*

Yes

27. Test C3 Comments (optional)

N/A

28. 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*

Yes

29. Test C4 Comments (optional)

N/A

30. 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

31. Test CE 1 Comments (optional)

32. 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

33. test CE 2 Comments (optional)

See written submission

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

**Choose exactly 1 option*

No

35. Test CE 3 Comments (optional)

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

**Choose exactly 1 option*

No

37. Test CE 4 Comments (optional)

See written submission

38. 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 DD02

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

N/A

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

Do you have any comments?

N/A

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

Do you have any comments on the draft HRA?

N/A

42. Equality Impact Screening Report (optional)

Do you have any comments on the EQ screening?

N/A

43. Rural Needs Impact Assessment (optional)

Do you have any comments on the RNIA?

N/A

44. 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.



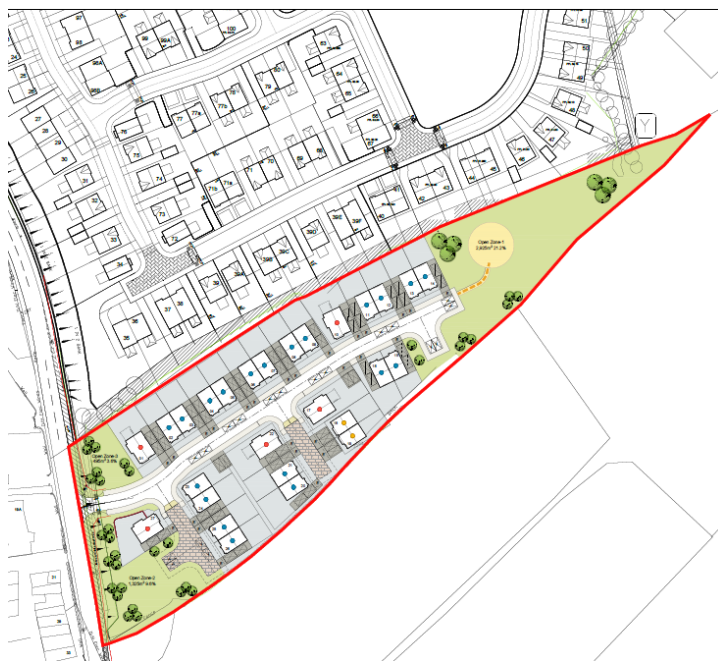
REF:DD02

REPRESENTATION TO ANDBC DRAFT PLAN STRATEGY 2032

SUBJECT: SPATIAL GROWTH STRATEGY (AS PERTAINS TO BALLYGOWAN) AND POLICY HOU12 (AFFORDABLE HOUSING IN THE COUNTRYSIDE)

1.0 INTRODUCTION

- 1.1 This is a response to the Council's Draft Plan Strategy (DPS) on behalf of Hilmark Homes Ltd. Hilmark Homes Ltd is a major developer in Ards and North Down. It has completed the successful housing development at 'The Forge' Ballygowan, and it is currently constructing a development at Regent Park, Newtownards. Both developments have delivered high quality housing to meet local housing needs.
- 1.2 Hilmark has additional lands remaining available for development at Moss Road, adjacent to The Forge. This would be highly suitable to accommodate some further sustainable growth in Ballygowan:



Ballygowan

- 1.3 This response sets out aspects where the DPS is considered to be unsound, with particular reference to the settlement of **Ballygowan**.

Legislative Context for Representations

- 1.4 Part 2 of the Planning (NI) Act 2011 sets out the general requirements for local development plans. This states that the purpose of the Independent Examination is to

determine whether: a) it satisfies the requirements relating to preparation of the DPD; and b) whether it is 'sound'.

- 1.5 The soundness tests relate to procedure; consistency; and coherence and effectiveness.

In relation to this submission, the '**coherence and effectiveness tests**' are the most relevant. These are:

CE1 – does it set out a coherent strategy from which policies and allocations logically flow;

CE2 – are the policies and allocations realistic and appropriate having considered alternatives and founded on a robust evidence base;

CE3 – there are clear mechanisms for implementation and monitoring; and

CE4 – it is reasonably flexible to deal with changing circumstances.

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 may be regarded as unsound under the Coherence and Effectiveness tests (CE1 – CE4).



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.

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 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

3.5 The proposed settlement hierarchy is set out in SGS2.

SGS 2: Settlement Hierarchy

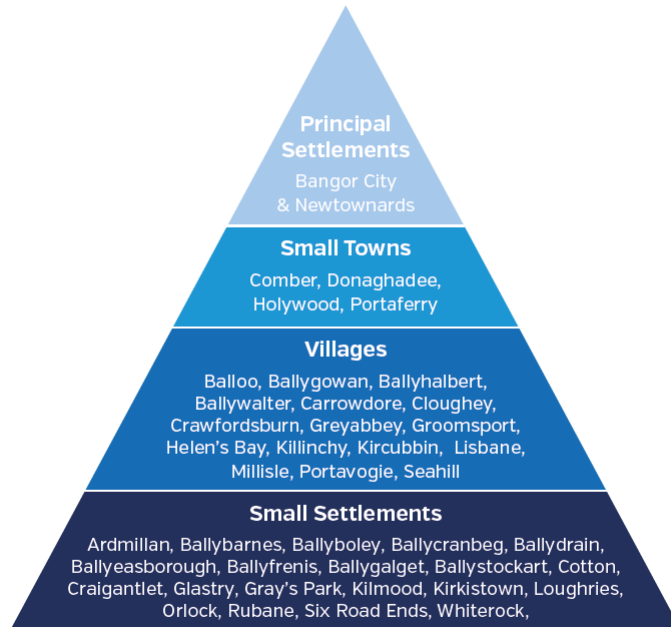


Figure 3: Settlement Hierarchy

3.6 The position of Bangor and Newtownards at the top of the hierarchy is logical.

3.7 The identification of Portaferry (population 2,372) as one of four 'small towns' is noted.

3.8 **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 one of the 'small towns' is unsound for the following principal reasons:**

- i) Ballygowan had a 2021 population of over 3000 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 major employment centres and has proven to be an attractive location for family housing.

3.9 Technical Supplement 1 provides detailed evaluations of the various settlements, including Ballygowan. Comments are set against the RDS evaluation framework. The summary position for Ballygowan is as follows;

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

3.10 It is concerning that the evaluations appear to have been carried out in 2020, and so a number of elements are outdated.

3.11 In particular the reference to '**no capacity**' in the WWTW for Ballygowan is now 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**.



Ballygowan WwTW under construction (December 2021) – Courtesy of NI Water

Ballygowan is a small village situated in County Down, within the Ards & North Down Borough Council area. The towns of Comber and Saintfield are both approximately 4 miles to the north-east, and to the south respectively, with the city of Belfast 7 miles north-west. The 2021 Census indicates that the population of Ballygowan is approximately 3,138. The existing WWTW was constructed in the village in the 1950s and comprised an inlet works, a CAS basin, a storm tank and a small sludge holding tank, as well as an MCC building to control the works and was designed to treat a population equivalent (PE) of 2,700. The existing works was therefore beyond capacity to treat the present day population, and the structures had exceeded their design life. An extensive upgrade was required to provide effective and robust wastewater treatment services for the future catchment area, allowing economic growth, while improving the local environment and adhering to a much tighter discharge consent of 7mg/l BOD, 10mg/l total suspended solids, and 1.5mg/l ammonia. The new fully automated works will serve a PE of 4,513.

- 3.12 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.
- 3.13 The fact that Ballygowan has excellent transport links, a primary school and other local facilities also point to its suitability for appropriate growth.
- 3.14 The Council's 'Village Plan' for Ballygowan has also highlighted the following positive points, expressed by the local community:

<p>What you told us is desirable about Ballygowan...</p> <ul style="list-style-type: none"> • Respondents identified the retail heart of the village with a wide selection of shops owned by local people providing high quality local produce as highly desirable. The shops provide a wide range of produce while still remaining local and in walkable distance for a majority of the residents • Respondents appreciated the connectivity links from the village to surrounding areas, which allows rapid commutes to Belfast City Centre for work or leisure. These transport links also allow residents to travel to Downpatrick, Comber or Newtownards with ease. Additionally, links to Strangford Lough and the surrounding countryside were mentioned. • The community spirit is very prevalent in the village with people identifying the friendly and welcoming nature of locals to everybody and anybody who uses the village. The village hall was also noted for providing community events throughout the year for all to enjoy. The schools are also shown as highly desirable from respondents and detailed as "fantastic and community driven", and also the playparks available. 	<p>What you think are the Unique Selling Points for Ballygowan...</p> <ol style="list-style-type: none"> 1 Respondents stated that the most unique selling point of Ballygowan is the rural location combined with strong connectivity and transport links to the surrounding areas. The village as such serves as a quiet, peaceful residential area but remains close to larger settlements including Belfast, Downpatrick, Comber and Newtownards. 2 The community in the village was identified as a unique selling point, with Ballygowan described as friendly and welcoming. Respondents highlighted that many families have lived in the area for several generations, contributing to the close-knit community spirit. 3 Ballygowan is home to a variety of high-quality, family-owned businesses providing local amenities to the village population. Despite its small size, the village enjoys a variety of different shops, takeaway options and other amenities.
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- 3.15 Finally, it is noted that Council Members, when considering earlier drafts of the Plan Strategy, expressed concern that if Ballygowan was not to be identified as a small town then it should not be disadvantaged. Unless amended, the DPS will clearly result in disadvantage to the settlement:

6.41 There was acknowledgement that Ballygowan did not display the range of services of a small town but a desire that it not be disadvantaged by not becoming a small town.

3.16 Ballygowan 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).

3.17 The PS notes that the housing allocation was informed by the SPPS, including HGIs, allowance for commitments; urban capacity studies etc.

3.18 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

3.19 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%.

3.20 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. 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 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

Principal Settlements

- 3.21 It is evident that Bangor and Newtownards have the largest allocations, with 4,508 and 3,381 houses respectively.

Small Towns

- 3.22 There are two striking anomalies in the allocations at small town level. These relate to Holywood and Portaferry.
- 3.23 **Portaferry** has been included as a small town. With its range of facilities this is not irrational. However on the basis of population (circa 1.4% of the Borough) its allocation would be expected to be around 180 units, yet it has been allocated 398 units (the same as Holywood which is about 5 times larger).

Villages

- 3.24 The allocation to the 16 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.

3.25 **First**, it is inconsistent with the approach taken in adjoining plans, such as NMDDC, where HS1 does provide an allocation for each village:

Villages		
Bessbrook		301
Rostrevor		119
Annalong		171
Crossgar		123
Ardglass		348
Dundrum		7
Hilltown		74
Drumaness		87
Camlough		80
Mayobridge		39
Killough		75
Newtownhamilton		65
Meigh		11
Annsborough		41
Ballyholland		46
Mullaghbane		12
Ballymartin		9
Forkhill		57
Strangford		60
Jonesborough		53
Ballykinler		25
Cullyhanna		40
Clough		15
Total 16%*		2,032**

Extract HS1 Allocations NMDDC DPS.

3.26 **Second**, 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.

3.27 **Third**, 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. This creates an imbalance across the Plan area which is inconsistent with the objective to meet diverse housing needs, including accessible and affordable homes.

3.28 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

- 3.29 **Fourth**, 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 a specific allocation is **unsound**.
- 3.30 **Fifth** 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 ²	0
Crawfordsburn	0
Greyabbey	8
Groomspport	0
Helen's Bay	0
Killinchy	0
Kircubbin	23
Lisbane	0
Millisle	30
Portavogie	44
Seahill	10
Total	207

- 3.31 **Sixth**, 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. However more recent evidence from NIHE indicates the social need has grown further, to around 30 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
Groomspport	Groomspport	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

3.32 Given that there is 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.

3.33 **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 POLICY HOU12 – AFFORDABLE HOUSING IN THE COUNTRYSIDE

4.1 As outlined above, Ballygowan should have its housing requirements met within its development limits. However if the PS persists with the lack of an adequate allocation then Policy HOU12 may become relevant.

4.2 There is no issue with the principle of a policy for provision of social housing in rural locations, However there are two key concerns with Policy HOU 12.

4.3 First there appears to be no 'evidence base' for the figure of 14 units. This figure should be flexible, with at least 20 units being permitted if a need can be demonstrated.

4.4 Second, the policy refers only to 'small settlements' as set out in the hierarchy. Hence no villages will be able to avail of the policy provisions, even if a requirement is identified. This cannot be the correct approach in a situation where the DPS does not envisage any significant housing allocations at the village level. Policy HOU12 of the DPS should be amended to refer to '**villages and small settlements**'

5.0 CONCLUSIONS AND SUMMARY

5.1 Overall, the Strategy fails to provide policies or allocations which are realistic and appropriate in relation to Ballygowan. In particular, there seems to have been little point in carrying out a settlement evaluation exercise as the DPS approach has been to treat all the villages in the same way, and not to consider their individual requirements in terms of available housing supply, choice and future needs. Indeed it is unfortunate that the DPS does not appear to have addressed a fundamental issue which was identified by the PAC back at the time of the ADAP preparation, ie to ensure transparency in translating settlement scores into housing numbers:

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.

- 5.2 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. Unless amended, the DPS must be regarded as unsound, particularly in relation to the CE1 and CE2 tests.

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February 2026

APPENDIX 1 HOUSING POTENTIAL IN BALLYGOWAN

TABLE 1 – POTENTIAL ON ZONED LAND (ADAP 2015)

DESIGNATION	LOCATION	COMMENT	POTENTIAL
HPA1	Prospect Road	Planning permissions extant for 54 dwellings, Not yet started.	54
HPA2	Adj St Marys	No recent applications. Church owned and not likely to be made available	27?
HPA3	Comber Road	complete	0
HPA4	Moss Road	complete	0
TOTAL			81

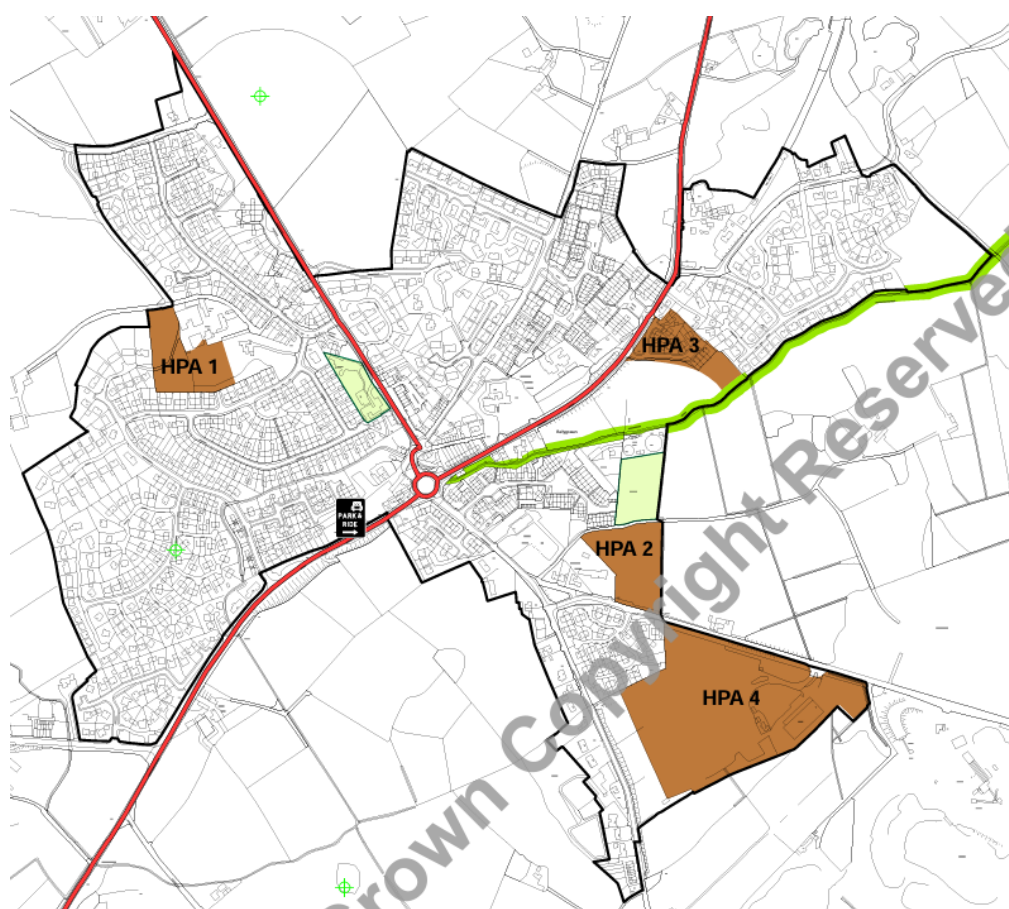


TABLE 2 – OTHER POTENTIAL IN BALLYGOWAN

PLANNING REF	LOCATION	COMMENT	POTENTIAL
LA06/2018/0541/F	THE SQUARE	6 APARTMENTS Not started	6
LA06/2021/0580/F	CHURCH HILL PARK	1 DWELLING Not started	1
LA06/2021/1135/F	CARRICKMANNON ROAD	1 DWELLING Not started	1
TOTAL			8