
Ards and North Down - Local Development Plan 2032

Representation to Draft Plan Strategy
Consultation

Andrews Family

February 2026

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1.0 INTRODUCTION

- 1.1 This representation has been prepared by **TSA Planning** on behalf of our client the **Andrews Family**, in respect of Ards and North Down Council's published Draft Plan Strategy (dPS), for their Local Development Plan 2032 (LDP).
- 1.2 This paper focusses on the Council's **Spatial Growth Strategy**, and provides an assessment of **Policies SGS 1: Spatial Growth Strategy; SGS 4: Strategic Housing Allocation; SGS 5: Strategic Housing Allocation across settlements; and SGS 6: Management of Housing Land Release** within the draft Plan Strategy, including the associated amplification text and evidence, within which we believe some elements render the document **unsound** in its current form.
- 1.3 To inform this response to the draft Plan Strategy, consideration is given to the legislative requirements relating to the preparation, form and content of the Local Development Plan set out in the Planning Act (NI) 2011 and The Planning (Local Development Plan) Regulations (NI) 2015. Consideration is also given to the following Policy and Guidance publications, along with the wider content of the Draft Plan Strategy (including accompanying assessments and technical supplements):
- The Regional Development Strategy (RDS) 2035;
 - The Strategic Planning Policy Statement (SPPS);
 - The Department's Development Plan Practice Notes (DPPN); and in particular:
 - DPPN 6 - Soundness; and
 - DPPN 7 - The Plan Strategy.
 - LDP Technical Supplement 1: Settlement Hierarchy and Settlement Evaluation (TS1);
 - LDP Technical Supplement Paper 2: Housing (TS2);
 - LDP Technical Supplement Paper 2B: Urban Capacity Study (UCS); and
 - Housing Land Availability Report 2024.
- Regard is also had for the Preferred Options Paper (POP) stage, the LDP Timetable, and the Council's Community Plan 'The Big Plan' 2017-2032.
- 1.4 **Section 2** of the paper analyses the Council's **Policy SGS 1: Spatial Growth Strategy**, including all associated text and evidence, which we believe to be unsound.
- 1.5 **Section 3** relates to the Council's **Policy SGS 4: Strategic Housing Allocation**, in respect of the overall housing growth figure for the Borough, which we believe to be unsound.
- 1.6 **Section 4** assesses **Policy SGS 5: Strategic Housing Allocation across settlements** and associated justification text, which we believe to be unsound.
- 1.7 **Section 5** reviews **Policy SGS 6: Management of Housing Land Release**, which we believe to be unsound.
- 1.8 **Section 6** identifies lands we believe are suitable for housing in unsound.
- 1.9 **Section 7** identifies lands we believe are suitable for housing in Comber.

2.0 SPATIAL GROWTH STRATEGY – SGS 1: SPATIAL GROWTH STRATEGY

2.1 Summary

2.1.1 SGS1: Spatial Growth Strategy sets out the Council’s strategy for supporting and directing growth to the settlements throughout the Borough over the Plan Period. In general, we support the Council’s Spatial Growth Strategy and the commitment to focus growth in Bangor and Newtownards and consolidate the role and function of Comber and Donaghadee.

2.1.2 However, in its current form SGS1: Spatial Growth Strategy does not meet the following tests of soundness:

Test 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
The Plan end date of 2032 will not allow for a 5 year land supply and as such, references to housing zonings over the plan period will not allow the policies and allocations within the Local Policies Plan to logically flow from the Plan Strategy.
Test C3: Did the Council take account of policy and guidance issued by the Department?
The current approach to limiting the growth strategy to the Plan Period (to 2032) may mean there is not a 5 year land supply at the point the Plan Strategy is adopted, as required by the SPPS.
Test CE4: It is reasonably flexible to enable it to deal with changing circumstances
The use of the “Plan Period” for residential zonings has the potential to cause a shortage of housing land once the Local Policies Plan (LPP) is adopted. Some wording within the wider text is too rigid to allow flexibility at Local Policies Plan.

2.2 Detailed Response

2.2.1 Whilst we support the Council’s overall Growth Strategy, we believe some of the text is overly restrictive, which render the Plan unsound. Para. 2.10 of the Spatial Growth Strategy identifies that “Housing zonings and a phasing approach will ensure land availability over the Plan period to meet housing needs”. The Council’s latest timetable identifies that the Plan Strategy is due to be adopted in Q3 2027 and the LPP is to be adopted in Q4 2031. Even if these target dates are met with no delay, the allocations set out within the Plan Strategy will not allow for a 5-year land supply once this document is adopted. As such, we believe that Para. 2.10 is not reasonably flexible and should be amended to identify that a 5-year land supply will be maintained, which will allow allocations to run past the Plan end date of 2032, if required.

2.3 Required Changes

- Update Para 2.10 to read “Housing zonings and a phasing approach will ensure land availability over the Plan period *and ensuring a 5-year land supply*, to meet housing needs”. (**Tests CE1; C3; and CE4**).

3.0 SPATIAL GROWTH STRATEGY – SGS 4: STRATEGIC HOUSING ALLOCATION

3.1 Summary

3.1.1 We strongly support the Council’s Strategic Housing Allocation for the Borough, as set out within **SGS4** and welcome the methodology utilised by the Council in order to ensure the growth figure is relevant to trends of the Council area and promotes growth in line with the economic aspirations of the Council.

3.1.2 However, in its current form the SGS4: Strategic Housing Allocation does not meet the following tests of soundness:

Test 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
Minor amendments are required to the policy to clearly set out the timeframe of the allocation, to ensure that the allocations and zonings logically flow at LPP stage.
Test CE2: The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base
The overall allocation figure to 2032 is not realistic or appropriate as this will not allow for a 5 year land supply at the point of Plan Strategy adoption in 2027 or LPP adoption in 2031.
Test CE4: It is reasonably flexible to enable it to deal with changing circumstances
The concentration on the Plan Period rather than allowing a 5-year land supply does not build in enough flexibility when considering the Council’s Timetable.

3.2 Detailed Response

3.2.1 Whilst we support the Council’s methodology for housing growth across the Borough, the Policy text solely refers to the Plan period (2032). As previously identified, the Council’s Timetable would not allow for a 5-year land supply at the time of Plan Strategy adoption, and only 1 year at Local Policies Plan adoption. It is not yet known when the Plan will be adopted, with the timetable subject to potential delay and as such we are unable to suggest an appropriate growth figure for SGS 4 at this stage. However, the Council should extrapolate the annual figure appropriately prior to adoption, to ensure a 5-year land supply. In addition, the final bullet point states “Management of the release of housing land to ensure the LDP maintains a 5 year supply throughout the Plan period. However, there will not be 5 years remaining of the Plan Period once the Plan Strategy is adopted. Therefore, the policy wording needs amended to reflect this.

3.3 Required Changes

- Extrapolate the housing allocation figure at point of adoption to allow for a 5-year land supply (**Tests CE1** and **CE2**).

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- Amend bullet points 3 to read “Management of the release of housing land to ensure the LDP maintains a 5-year land supply through the Plan period, and beyond if required (see SGS 6)” (**Tests CE1 and CE4**).

4.0 SPATIAL GROWTH STRATEGY – SGS 5: STRATEGIC HOUSING ALLOCATION ACROSS SETTLEMENTS

4.1 Summary

- 4.1.1 We support the Council’s Strategy in respect of allocating the overall housing growth figure to individual settlements and the percentage split across same.
- 4.1.2 However, in its current form Strategic Policy HS3 does not meet the following tests of soundness, and requires some minor amendments:

Test 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

The dates and allocations set out within Table 6 of SGS5 does not allow for a coherent Strategy as some key dates and footnotes are missing to explain the figures included in the table
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4.2 Detailed Response

- 4.2.1 As identified above, we support the Council’s Strategic Housing Allocation across settlements in respect of the percentage split and general approach. In particular, we appreciate that the Council are clearly directing growth to particular settlements and agree that the most up to date residual allocation should be used within the Plan Strategy.

Housing Allocation 2017-2032

- 4.2.2 In respect of the “Housing Allocation 2017-2032” Column, we note from the Housing evidence paper than this column utilises the residual allocation from 2022 to 2032, taking away the units built in the Borough from 2017 to 2022. This gives an overall allocation within the Table of 12,649. We agree with this methodology, however, it is not clear within the table that this is the approach the Council have taken. As such, the title of this Column should be updated to read “**Residual** Housing Allocation **2022-2032**” and a footnote added to Page 77 to identify that the Borough completions between 2017 and 2022 (2,959 units) have been taken away from the overall Plan period allocation of 15,608 (2017-2032). The table may also need amended with more up to date information if available prior to adoption. Whilst we note that footnote 8 states that some adjustments may need to be made to the allocations, including these amendments will ensure that the allocations within the next stage of the Plan, the LPP, logically and clearly flow from the figures included within Table 6.
- 4.2.3 As previously stated in **Section 3**, the overall Strategic Housing Allocation may need to be extrapolated past 2032 to give a 5-year land supply at the point the Plan Strategy is adopted. If this is the case, then the allocations within this Column should also be updated accordingly.

Existing Commitments

- 4.2.4 Within the “Existing Commitments” Column, it is unclear at what date these commitments were existing, without reading the wider evidence papers. As such, the

date of “existing commitments” should be included in the column title to ensure the strategy is coherent. This is currently 2022 but may be different prior to adoption of the Plan Strategy. It would also be prudent to add a footnote in respect of this column to identify that “Existing Commitments” include extant planning approvals and existing zoned lands.

4.3 Required Changes

- Update Column title to read “**Residual** Housing Allocation **2022-2032**” (**Test CE1**).
- Add a footnote added to Page 77 to identify that the Borough completions between 2017 and 2022 (2,959 units) have been taken away from the overall Plan period allocation of 15,608 (2017-2032) (**Test CE1**).
- Update allocations within Table 6 in line with any revisions to the overall Strategic Housing Allocation, if required (**Test CE1**).
- Include relevant year within title of the existing commitments column (**Test CE1**).
- Add a footnote to identify that existing commitments include extant planning approvals and existing zoned lands (**Test CE1**).

5.0 SPATIAL GROWTH STRATEGY – SGS 6: MANAGEMENT OF HOUSING LAND RELEASE

5.1 Summary

- 5.1.1 Policy SGS 6: Management of Housing Land Release identifies the Council’s approach to phasing housing land and releasing Phase 2 land for development. Whilst we support the phasing of housing land as a methodology we feel the current wording of SGS6 renders it unsound.

Test 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
Due to a potential shortfall in land to meet housing allocations, the current Policy wording will not allow for the allocations within the LPP to logically flow from same
Test CE2: The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base
The current wording of the Policy is inappropriate and unrealistic given the housing growth aspirations and a reliance on existing committed sites and zoned lands within the urban footprint as Phase 1 housing.
Test CE4: It is reasonably flexible to enable it to deal with changing circumstances
The criteria for zoning of Phase 1 lands are not reasonably flexible to allow for scenarios where the stated criteria would not meet the 5-year land supply at the point of the first draft/adopted LPP (prior to review of future Phase 2 lands).

5.2 Detailed Response

- 5.2.1 Policy SGS 6 sets out the criteria for zoning Phase 1 land at the LPP stage as well as criteria for zoning of Phase 2 land and the mechanisms for how this land will be released for development. The criteria for zoning Phase 1 land are existing commitments (extant approvals) and housing zonings within the urban footprint, including new zonings and any retained zonings within the urban footprint. We recognise that Phase 2 lands may be released during the Plan period if monitoring indicates that there is a need to maintain a 5-year supply of available housing land, however, this requires the LPP to be adopted and the first round of monitoring and review to be undertaken. When reviewing existing commitments in Table 6 of the Plan Strategy (which includes extant planning approvals and existing zonings), it is likely that these criteria will not provide a 5-year land supply at the point of LPP adoption in some settlements. For example, in Bangor the residual allocation 2022-3032 is 4,508 dwellings. This equates to 451 dwellings per annum. If this is extrapolated for a 5-year supply at the point of Plan Strategy adoption and LPP adoption, this equates to 2,255 dwellings. As identified in Table 6, the existing commitments for Bangor total 2,004 dwellings and this includes all existing zonings and not only those within the urban footprint. As it is also likely that not all existing commitments will be brought forward within the 5 years, the strategy for zoning Phase 1 lands is not realistic or reasonably flexible and will result in an incoherent strategy during later stages of the Plan. As such, the Policy wording for Phase 1 lands

should include any new zonings, and any retained zonings outside of the urban footprint, where required to meet the 5-year land supply.

5.2.2 It is noted that the justification and amplification text identifies at Para. 2.55 that legacy housing zonings and proposals with extant planning permission, together with sites identified through the Urban Capacity Study and the Windfall allowance, make up the majority of the strategic housing requirement for the Borough. However, these sites do not make up the entirety Strategic Housing Allocation. Phase 1 lands should comprise as a minimum, a 5-year land supply, and at the point of LPP adoption (currently estimated 2031), this will run past the Plan period of 2032. As such, the criteria for Phase 1 lands should be reasonably flexible to allow the entirety of the Strategic Housing Allocation (as well as any adjustments required for a 5-year land supply), to be met on Phase 1 lands at the LPP stage. Furthermore, it is not consistent or appropriate to compare existing commitments for the Borough as a whole against the strategic housing allocation. It is the Council's strategy to use the housing evaluation framework to direct allocations and growth appropriately across different settlements within the Borough and appropriate and sustainable growth will not be achieved if the Council revert to Borough wide figures when assessing if there is sufficient Phase 1 land. As such, the mechanisms for phasing land must build in sufficient flexibility for individual settlements which may not have a 5-year land supply through extant approvals and existing zonings within the urban footprint.

5.2.3 Some existing zonings within the urban footprint may not be suitable for residential uses or available for development. As such, it should be made clear within SGS6 that existing zonings within the urban footprint will undergo a robust assessment at draft LPP stage to ensure that they are suitable and deliverable and that they are likely to contribute to the provision of housing.

5.3 Required Changes

- Amend the criteria for zoning Phase 1 land to include “any new zonings, and any retained zonings outside of the urban footprint, where required to meet the 5-year land supply at the point of the LPP.” (**Tests CE1; CE2 and CE4**)
- Identify that a robust assessment will be undertaken at LPP stage of the availability and deliverability of existing housing zonings (**Test CE1**).

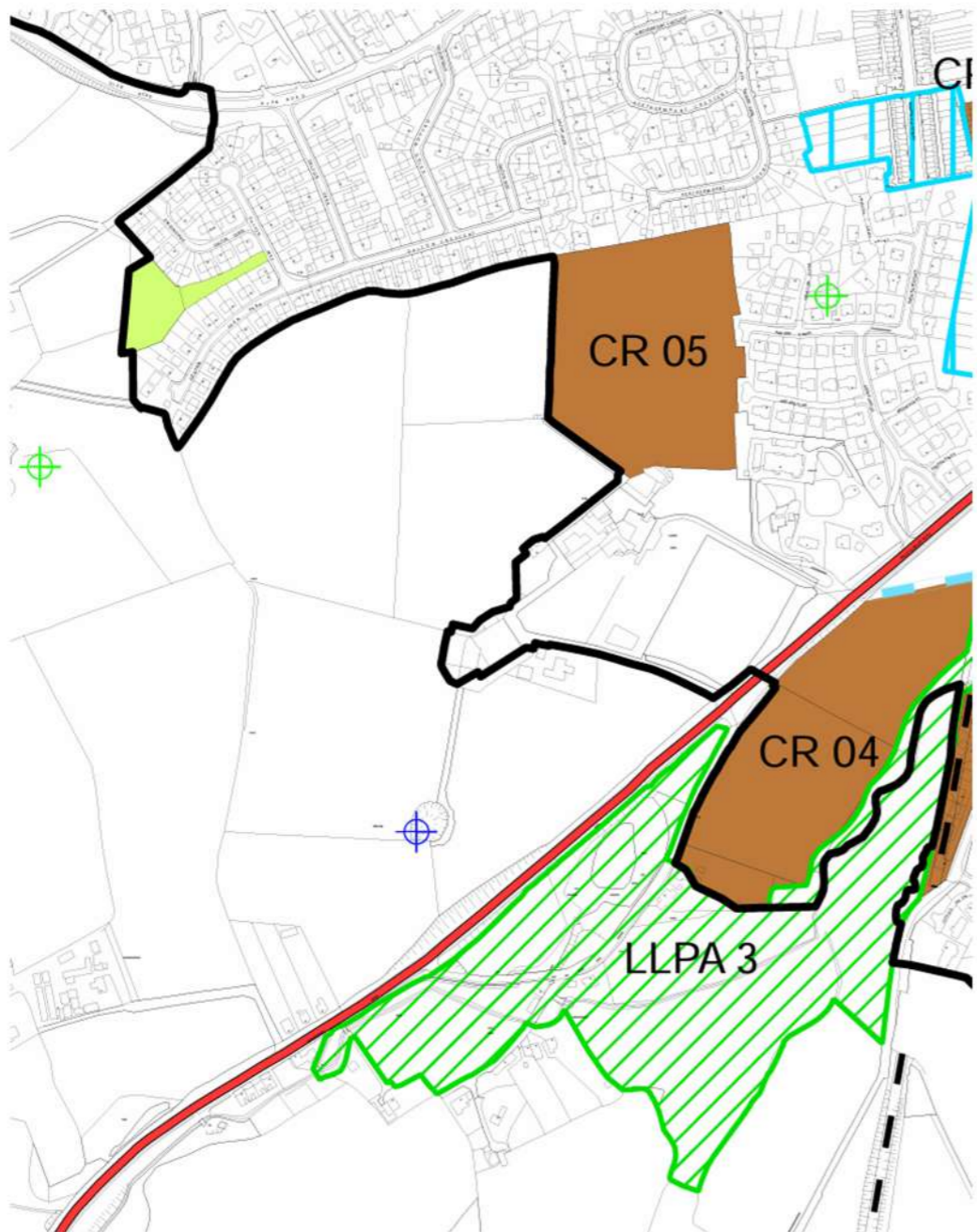
6.0 COMBER

- 6.1 This submission is made on behalf of the Andrews Family, a recognised and well-regarded local landowner with strong links to Comber. The Andrews family have worked in partnership with local housebuilders to deliver a number of high quality housing developments across the Town.
- 6.2 The Council have identified that a full review of existing commitments will be undertaken at the Local Policies Plan Stage. In addition, the evidence within this report highlights that there are some settlements, where it is likely that additional Phase 1 lands will be required at the Local Policies Plan stage to ensure a 5-year land supply.
- 6.3 Table 6 within the DPS indicates that there is currently enough housing lands within Comber, through existing commitments, urban capacity potential and windfall allowance to meet the housing allocation to 2032. However, a full assessment of existing commitments and their deliverability has not yet been undertaken, and as the current surplus is minimal (150 dwellings), this assessment may result in a deficit of housing lands. Furthermore, Table 6 provides a housing allocation to 2032, and as detailed within this response, there will be a requirement to ensure a 5-year supply of Phase 1 housing land at the point of LPP adoption. As this is currently estimated to take place in 2031, the allocation figure will need to be extrapolated beyond 2032. Therefore, it is anticipated that additional Phase 1 housing land may be required in Comber at draft Local Policies Plan stage.
- 6.4 Whilst we appreciate that any extensions and residential designations are reserved for Local Policies Plan stage, we feel it is expedient to make the Council aware at this stage that our client is committed to bring two parcels of land forward for residential development as soon as possible as part of a 5 year supply of housing.
- 1. Lands North of Ballygowan Road and South of Dalton Crescent*
- 6.5 The first parcel, as illustrated at **Annex 1**, measures c.16hectares and is located within the west of the town, to the north of Ballygowan Road and South of Dalton Crescent. They are ideally situated to the west of existing zoning CR05, which is currently under construction. The lands currently sit adjacent but outside of the settlement development limit but are bound by residential development on two sides and the Ballygowan Road to the south, therefore providing a natural rounding off opportunity (see **Annex 2**).
- 2. Lands to the west of Killinchy Road*
- 6.6 The second parcel of land measures c.2hectares and is located to the west of Carnasure Cottages, Killinchy Road as shown at **Annex 3**. They are situated adjacent to the settlement development limit and generally to the south of now complete residential zoning CR09. The site would represent a minor infilling to the settlement limit (see **Annex 4**).
- 6.7 Should additional lands be required in Comber, we would respectfully request this representation is held on file for reference at draft LPP stage, in order to meet any requirement for further housing lands at that stage.

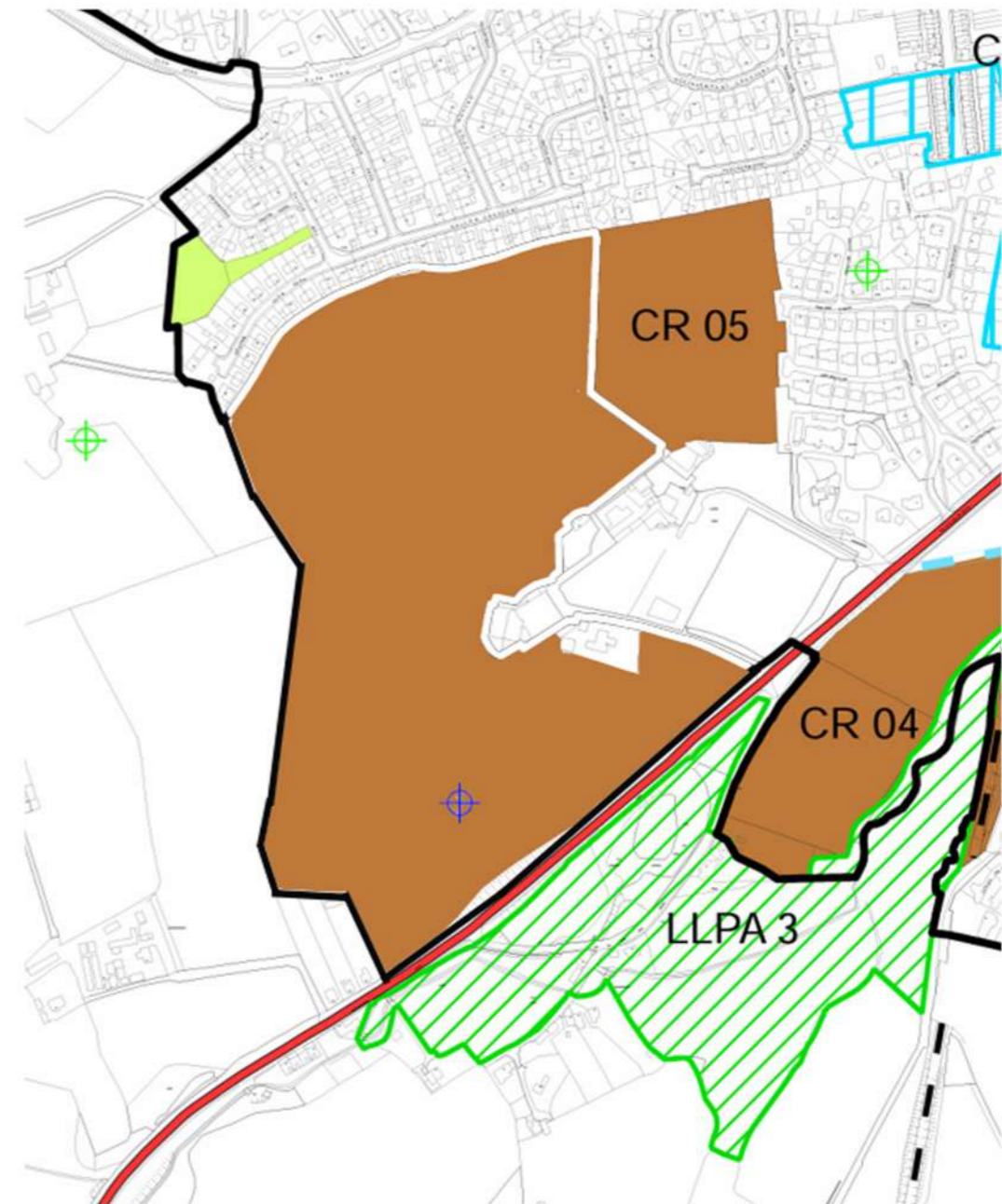
Annex 1 – Site 1 Site Location Plan



Annex 2 – Site 1 Example LPP Map



Existing Area Plan

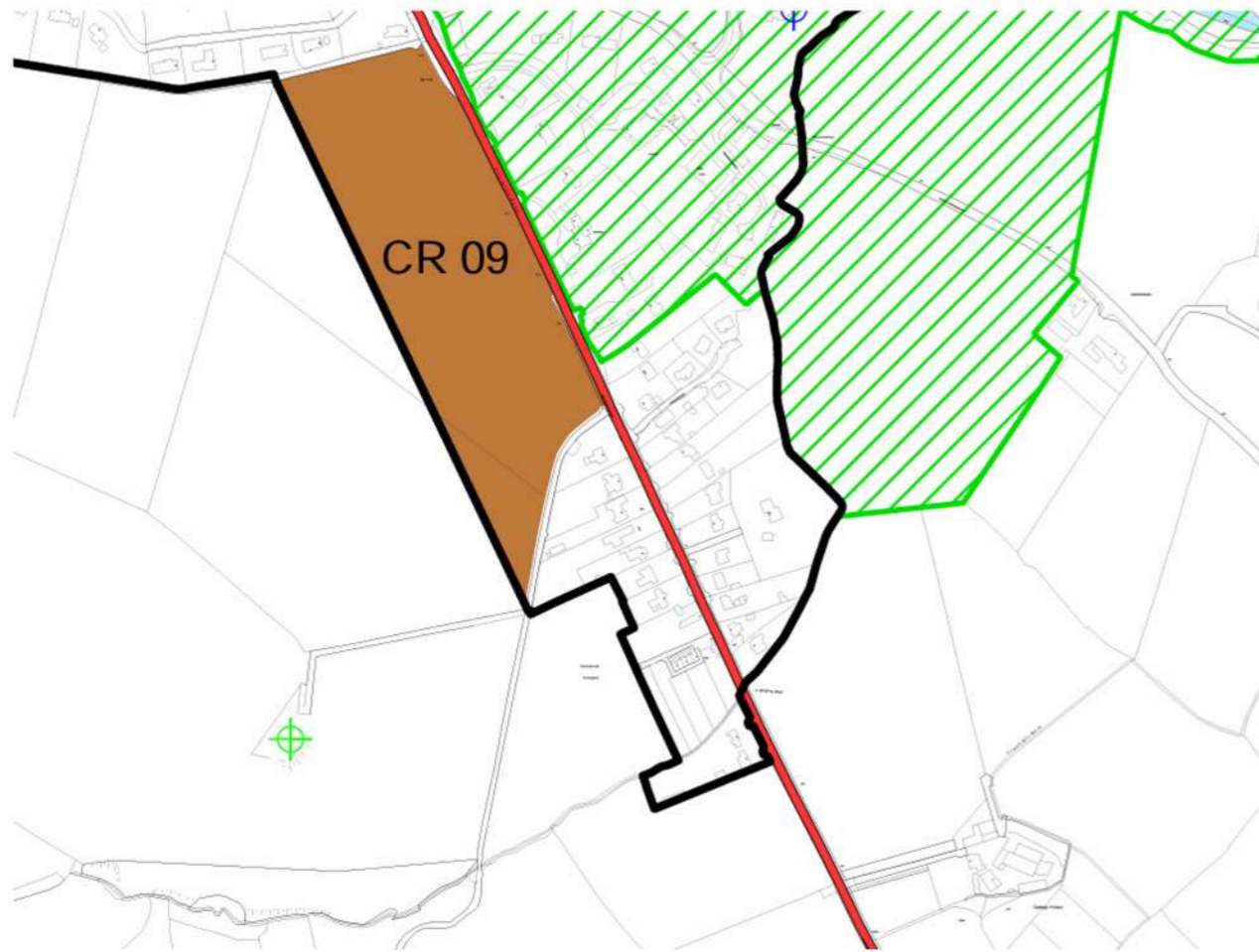


Proposed Local Development Plan

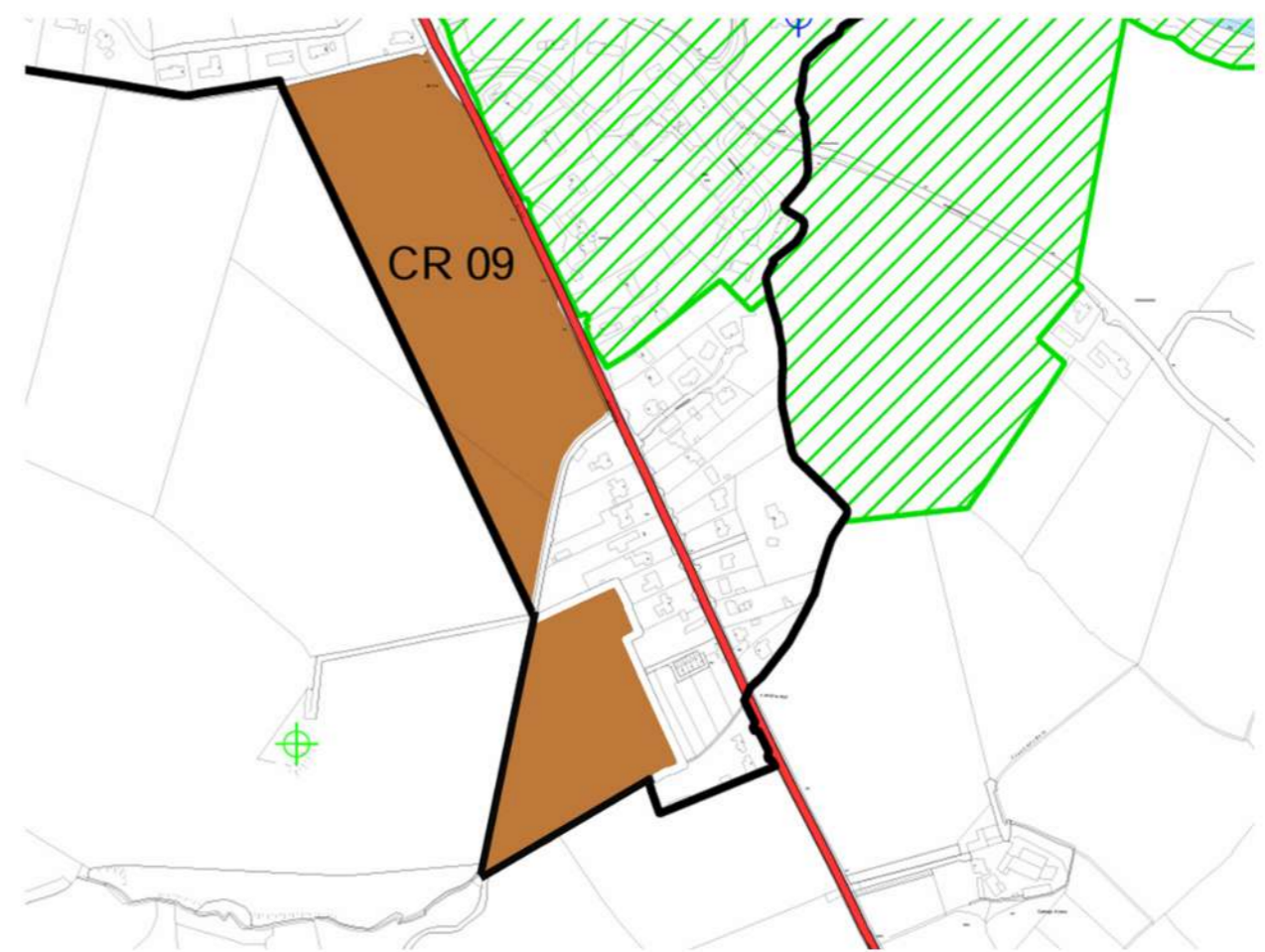
Annex 3 – Site 2 Site Location Plan



Annex 4 – Site 2 Example LPP Map



Existing Area Plan



Proposed Local Development Plan